

## **EXHIBIT 7**

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

- - - - - :  
JOHNNY M. HUNT, :  
:  
Plaintiff, : CASE NO.  
:  
vs. : 3:23-cv-0000243  
:  
SOUTHERN BAPTIST CONVENTION, :  
GUIDEPOST SOLUTIONS LLC and :  
EXECUTIVE COMMITTEE OF THE :  
SOUTHERN BAPTIST CONVENTION :  
:  
Defendants. :  
:  
- - - - - :

VIDEO DEPOSITION OF SAMANTHA KILPATRICK

DATE: February 2, 2024  
TIME: 9:12 a.m.  
LOCATION: Veritext Legal Solutions  
1250 I Street, NW  
Suite 901  
Washington, DC 20005

REPORTED BY: Constance H. Rhodes  
Reporter, Notary

Veritext Legal Solutions  
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Washington, DC 20005

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ALSO PRESENT (Via Zoom)

Scott Murray

Kathy Klein

Ella Merritt

Jon Anderson

Johnny Hunt

\* \* \* \* \*

## C O N T E N T S

EXAMINATION BY:	PAGE
Counsel for Plaintiff	6
Counsel for Defendant EC	304

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Exhibit 1	Guidepost Responses to Plaintiff's First Interrogatories
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Exhibit 20	Interview notes re: REDACTED

(\* Exhibits attached to transcript.)

P R O C E E D I N G S

VIDEOGRAPHER: Good morning. We are going on the record at 9:12 a.m., on February 2nd, 2024. This is media unit one for the video-recorded deposition of Samantha Kilpatrick, taken by counsel for the plaintiff in the matter of the Johnny Hunt versus Southern Baptist Convention, filed in the US District Court for the Middle District of Tennessee. Case Number 3:33-cv-0024.

The location of the deposition is at 1250 I Street, Northwest, Suite 901, Washington, DC. My name is Warren Brey, representing Veritext Legal Solutions. I'm the videographer. The court reporter is Connie Rhodes from the firm Veritext Legal Solutions.

Counsel, please introduce yourselves for the record.

MR. MACGILL: Good morning, Rob MacGill and Patrick Sanders representing plaintiff Pastor Johnny Hunt.

MR. KLEIN: And representing the witness, Samantha Kilpatrick, Scott Klein and Alex Otchy for

1 Mintz & Gold.

2 MS. CALLAS: Gretchen Callas for the  
3 Executive Committee.

4 MR. BUNDREN: Brandon Bundren for the  
5 Executive Committee.

6 VIDEOGRAPHER: Will the court reporter  
7 please swear in the witness?

8 WHEREUPON,

9 SAMANTHA KILPATRICK  
10 called as a witness, and having been first duly  
11 sworn, was examined and testified as follows:

12 EXAMINATION BY COUNSEL FOR PLAINTIFF

13 BY MR. MACGILL:

14 Q Good morning, ma'am.

15 A Good morning.

16 Q Could you state your name for the  
17 record, please?

18 A Samantha Kilpatrick.

19 Q All right. And where are you employed,  
20 ma'am?

21 A I'm employed with Guidepost Solutions.

22 Q And what is your role with Guideposts?

1           A       I'm the senior managing director of the  
2       faith-based practice.

3           Q       Of the what based?

4           A       Faith-based --

5           Q       Faith-based practice.

6           A       -- practice.

7           Q       And what is the faith-based practice?

8           A       The faith-based practice is just an  
9       area, a group of us who work on primarily cases  
10      that involve faith-based institutions.

11          Q       Have you yourself worked on more than  
12      one faith-based institution?

13          A       Yes.

14          Q       Which faith-based institutions have you  
15      worked on?

16          A       I've worked on a number of them. The  
17      ones that are public facing -- I've have worked on  
18      Christianity Today faith-based matter; United  
19      Methodist Church matter; several individual  
20      Baptist church matters; some PCA -- Presbyterian  
21      Churches of America matters; and some PRCA matters  
22      -- Presbyterian Reform Churches of America. I've



1 worked with camps, schools.

2 Q What's the last one?

3 A Schools.

4 Q What schools?

5 A Faith-based schools.

6 Q Faith-based schools. Okay. Is there a  
7 name for the faith-based schools?

8 A We just have had -- we've had -- I've  
9 had clients in the past and with Guidepost that  
10 have been faith-based schools.

11 Q Okay. Fair enough. Now, how long have  
12 you worked with Guidepost?

13 A I have been employed by Guidepost as  
14 senior managing director since November of 2022.

15 Q And did you -- when did you become  
16 involved with the investigation involving the SBC?

17 A In the fall of 2021.

18 Q In the fall of 2021?

19 A Yes.

20 Q What was your role in -- what role did  
21 you have before you were senior managing director?

22 A I worked with Guidepost as an

1 independent contractor.

2 Q And for how long did you work with  
3 Guidepost as an independent contractor?

4 A From the fall of 2021 through November  
5 of 2022 when they hired me.

6 Q Where did you work before Guidepost as  
7 an independent contractor?

8 A I had a law practice in North Carolina.

9 Q In North Carolina?

10 A Uh-huh.

11 Q And let's go through your education  
12 background and we'll talk about your law practice?

13 A Sure.

14 Q Where were you educated, ma'am.

15 A I attended Meredith College in Raleigh  
16 North Carolina.

17 Q When did you graduate?

18 A 1993.

19 Q And what was your field of study?

20 A I received a BA in political studies and  
21 psychology.

22 Q And did you pursue a postgraduate

1 education?

2 A I did.

3 Q Law school?

4 A Yes, sir.

5 Q Where did you graduate from law school.

6 A University of New Carolina at Chapel  
7 Hill.

8 Q In what year.

9 A 1996.

10 (Technical issues.)

11 VIDEOGRAPHER: Going off the record at  
12 9:17 a.m.

13 (Whereupon, a brief recess was taken.)

14 VIDEOGRAPHER: We're now back on the  
15 record as 9:18 a.m. you may proceed.

16 BY MR. MACGILL:

17 Q You graduated from law school in the  
18 1996; is that right?

19 A That's correct.

20 Q What did you do after your law school  
21 graduation?

22 A After law school graduation I worked for

1 a small family law firm for six months.

2 Q Where did you go?

3 A I went to the Wake County district  
4 attorney's office.

5 Q Wait, W-A-I-T?

6 A Wake, W-A-K-E.

7 Q Thank you. And how long did you work at  
8 the district attorney's office in Wake.

9 A I worked at the district attorney's  
10 office from 19 -- early 1997 to mid-2001.

11 Q And where did you go in 2001?

12 A In 2001 I went and started doing solo  
13 practice on a less full-time basis.

14 Q And for how many years did you do the  
15 solo practice?

16 A 2001 until 2012.

17 Q And where did you go in 2012?

18 A In 2012 I formed a law practice with my  
19 husband, who is also an attorney. We formed that  
20 practice in 2012.

21 Q And you continued in that practice until  
22 you joined as an independent contractor for

1 Guidepost?

2 A Yes. There was a short time frame  
3 towards the end, where I did some work -- I did --  
4 I was employed by GRACE, Godly Response to Abuse  
5 in Christian Environments.

6 Q In what year did you do that?

7 A May -- I was with them from May of 2021  
8 until August of 2021.

9 Q All right. So with respect to -- and  
10 does your husband still have the law firm?

11 A No.

12 Q And so the law firm was dissolved?

13 A Yes.

14 Q Now, you're married?

15 A Yes.

16 Q And children?

17 A Yes.

18 Q How many children?

19 A Two.

20 Q All right. And where do you live,  
21 ma'am?

22 A Raleigh, North Carolina.

1 Q And do you work remotely for Guidepost?

2 A Yes, I do.

3 Q Now, you understand you are being --  
4 going to be asked today about the work that you  
5 did and that your company did in connection with  
6 some publications that were made about Pastor  
7 Johnny Hunt. Is that your general understanding?

8 A Yes.

9 Q What have you done to prepare for your  
10 testimony today?

11 A I had a few prep sessions with Scott and  
12 Alex and reviewed documents with them.

13 Q And who is Scott and who is Alex?

14 A Scott Klein who is an attorney  
15 representing Guidepost and Alex as well is an  
16 attorney.

17 Q Alex's last name, do you remember?

18 A I'm drawing a blank. I'm sorry.

19 MR. OTCHY: I'm not offended.

20 BY MR. MACGILL:

21 Q It's Alex Otchy, right?

22 A Yes.

1           Q     Okay. Fair enough. So these two  
2 gentleman are the gentlemen that you met with to  
3 prepare; is that right?

4           A     Yes, sir.

5           Q     And you said you reviewed some documents  
6 to prepare to give testimony?

7           A     Yes, sir.

8           Q     First of all, how many meetings did you  
9 have with Mr. Klein and Mr. Otchy?

10          A     I had two meetings with them.

11          Q     When were they, ma'am?

12          A     I had a meeting last Friday with them  
13 and then a meeting on Monday morning.

14          Q     And how long was the meeting on Friday.

15          A     I think the meeting on Friday was around  
16 three hours.

17          Q     And how long was the meeting on Monday.

18          A     Around two.

19          Q     And was it -- were these meetings by  
20 Zoom or virtually?

21          A     They were virtual, yes.

22          Q     And you said you reviewed documents.

1 Describe the documents you reviewed to give  
2 testimony today?

3 A I reviewed some emails and some  
4 documents that -- where I had taken notes on  
5 matters related to this.

6 Q What was the subject matter of the  
7 emails?

8 A The subject matter of the emails. I  
9 believe that the secretary matter of the emails  
10 had to do with communications with the REDACTED  
11 that I was part of those emails.

12 Q You said you reviewed documents. What  
13 documents did you review?

14 A Those emails and then some photocopied  
15 notes that I had submitted as part of discovery.

16 Q Did you put notes on the REDACTED story,  
17 so to speak?

18 A I did.

19 Q And you recognize your own handwriting  
20 in that REDACTED story?

21 A Yes, sir.

22 Q And that was pertaining to a REDACTED



1 story dated March 31, 2022; is that right?

2 A Yes, sir.

3 Q Did you do typewritten notes of the  
4 interview on March 31, 2022 with the REDACTED?

5 A I did do some typewritten notes on that  
6 interview. Yes.

7 Q I'm going to hand you Exhibit 20 that  
8 was marked yesterday and I'm going to ask you,  
9 Exhibit 20, are those typewritten notes that you  
10 prepared?

11 A Yes, sir.

12 Q So with respect to those notes were  
13 they -- did you endeavor in preparing these notes  
14 to be accurate and truthful in terms of  
15 information you provided?

16 A Yes, sir.

17 Q So at the time that you created these  
18 notes, Exhibit 20, you did so in the ordinary  
19 course of your work at Guidepost?

20 A Yes, sir.

21 Q And when I say at Guidepost, you  
22 prepared Exhibit 20 in connection with your role

1 as you've described it on this record in working  
2 on the investigation that's at issue in this case;  
3 is that right?

4 A Yes, sir.

5 Q And did you circulate these notes of the  
6 interview and materials provided on March 31,  
7 2022, to anyone else at Guidepost?

8 A Yes.

9 Q Who?

10 A Russ -- Russell Holske.

11 Q Anyone else?

12 A I don't recall.

13 Q Okay. Now, looking at these notes, I  
14 just want to understand the process that you  
15 engaged yourself in on March 31. On March 31,  
16 2022, you were in person with the REDACTED; is that  
17 right?

18 A Yes.

19 Q Second, this was an all-day meeting,  
20 wasn't it?

21 A Yes.

22 Q Third. At the time that you had this

1 all-day meeting with the REDACTED you had the  
2 REDACTED story in front of you as well, right?

3 A Yes, sir.

4 Q And as you took your notes did you have  
5 their "story" in front of you?

6 A Yes, I did.

7 Q And I'm going to ask you if this is the  
8 REDACTED story that you had in front of you at the  
9 time that you created Exhibit 20.

10 A Yes, it is.

11 Q Now, ma'am, I want to be somewhat  
12 specific about this. With respect to the  
13 materials you had in front of you on that March 31  
14 meeting you had Exhibit 7 in front of you, right,  
15 as you just confirmed, right?

16 A Yes.

17 Q And you were listening to what they had  
18 to say, the REDACTED?

19 A Yes.

20 Q And at the same time, while having those  
21 materials, Exhibit 7, in front of you and  
22 listening to their words spoken, you were creating

1 Exhibit 20; is that right?

2 MR. KLEIN: Objection as to form. You can  
3 answer.

4 THE WITNESS: Can want ask that question  
5 again.

6 BY MR. MACGILL:

7 Q Did you create the document as the  
8 meeting was progressing or once you got back to  
9 Raleigh.

10 A No, I did not create that document as  
11 the meeting was progressing.

12 Q You did afterwards.

13 A Yes.

14 Q Now, where are the -- did you create --  
15 take notes?

16 A I took notes on this document that's  
17 Exhibit 7, and I had a note pad with me that I  
18 also took notes on.

19 Q Did you turn over the note pad with your  
20 notes to counsel?

21 A I don't have those notes. I didn't have  
22 those notes.

1           Q       Now, when you created Exhibit 20, did  
2       you make use of the notes on the notepad that you  
3       had during the meeting on March 31?

4           A       I did.

5           Q       And did you make use of Exhibit 7 in  
6       creating the document Exhibit 20?

7           A       Yes, sir.

8           Q       So the sources for Exhibit 20 -- you had  
9       three sources at least for Exhibit 20, what you  
10      heard during that meeting; is that right?

11          A       Yes.

12          Q       You had the Exhibit 7 as a source for  
13      Exhibit 20?

14          A       Yes.

15          Q       And you had your recollections as you  
16      reflected on them when you created Exhibit 20,  
17      right?

18          A       Yes.

19          Q       All right. So was Exhibit 20 prepared  
20      with the aim of being accurate in all respects in  
21      what you reported?

22          A       Yes.

1           Q     And now I want to refer you to Exhibit 7  
2 specifically, and I'd like to refer you to the  
3 entry of the REDACTED pertaining to August 5th?

4                     Could you please turn to that. And if it  
5 would help you, I can give you a page number.

6           A     If you could give me a page number,  
7 please.

8           Q     Yes. It's page number 16.

9           A     Yes.

10          Q     Now, as we look at page 16 of Exhibit 7,

11                     REDACTED

12                     REDACTED

13                     REDACTED

14          A     REDACTED

15          Q     REDACTED

16          A     REDACTED

17          Q     REDACTED

18                     REDACTED

19          A     REDACTED

20          Q     REDACTED

21          A     REDACTED

22          Q     REDACTED

1 A REDACTED

2 Q REDACTED

3 A REDACTED

4 Q REDACTED

5 REDACTED

6 REDACTED

7 A REDACTED

8 Q REDACTED

9 REDACTED

10 REDACTED

11 A REDACTED

12 Q Now, I want to refer you to some  
13 specific language here. REDACTED

14 REDACTED

15 REDACTED

16 REDACTED

17 REDACTED

18 A I did not write this document, but...

19 Q REDACTED

20 REDACTED

21 A REDACTED

22 Q Did you have any reason to challenge

1 what REDACTED

2 REDACTED

3 REDACTED

4 REDACTED

5 A Can you repeat that?

6 Q Did you challenge or disagree with these  
7 words written by REDACTED

8 REDACTED

9 REDACTED

10 REDACTED

11 MR. KLEIN: Objection as to form. You can  
12 answer.

13 THE WITNESS: Did I challenge is at the  
14 time.

15 BY MR. MACGILL:

16 Q At the time.

17 A No, sir.

18 Q Did you challenge it in terms of the  
19 words you wrote yourself in creating a report in  
20 Exhibit 20?

21 MR. KLEIN: Objection as to form. You can  
22 answer.



1           THE WITNESS: Do you have a specific place  
2           that you want me to reference?

3           BY MR. MACGILL:

4           Q       Well, yes. I mean if you look at your  
5           own entry on Exhibit 20 you can see that you  
6           yourself in Exhibit 20 describe the August 5th  
7           events, right? And I'll refer you to Bates number  
8           GP7650?

9           A       Okay.

10          Q       Do you see your entry about August 5,  
11          2010?

12          A       Yes.

13          Q       You didn't make any report of any kind  
14          about                    REDACTED

15                                REDACTED

16                                REDACTED

17          REDACTED   You didn't make any reference to that in  
18          your own notes about the August 5th events in your  
19          Exhibit 20, did you?

20          A       No, sir.

21          Q       And in fact, ma'am, this description of  
22                                REDACTED

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REDACTED

REDACTED So you agree with that?

MR. KLEIN: Objection as to form. You can  
answer.

THE WITNESS: I don't.

BY MR. MACGILL:

Q You don't agree with that. REDACTED

REDACTED

REDACTED

A In -- in the work that I do, REDACTED

REDACTED

REDACTED .

Q I didn't ask about REDACTED

REDACTED

REDACTED

REDACTED

REDACTED

REDACTED

REDACTED

A I would repeat. REDACTED

REDACTED

REDACTED

1 REDACTED

2 REDACTED

3 Q And you made no reference -- when it  
4 came to your part you made no reference in your  
5 notes

REDACTED

6 REDACTED

7 MR. KLEIN: Are you talking about just on

8 REDACTED

9 BY MR. MACGILL:

10 Q REDACTED

11 A REDACTED

12 Q No. So we can read with our own eyes  
13 that when you reported the events REDACTED

14 REDACTED

15 REDACTED

16 REDACTED

17 A No, I did not.

18 Q Now, let's be more specific. If you  
19 look at what your notes on Exhibit 7, the second  
20 line, if you look at REDACTED

21 REDACTED

22 REDACTED

1 Do you see that?

2 A I do.

3 Q So did you hear with your own ears,  
4 ma'am, that this is what had occurred, REDACTED

5 REDACTED

6 REDACTED

7 Do you see the reference I'm --

8 A I do. I do. I don't recall.

9 Q Well, but let's look at what you  
10 actually did.

11 A Uh-huh.

12 Q Okay. When it came time for you to  
13 write about REDACTED

14 REDACTED

15 REDACTED , which are  
16 Exhibit 20, please read to the court what you  
17 wrote as the first bullet entry under REDACTED

18 REDACTED

19 A REDACTED

20 Q REDACTED

21 REDACTED

22 A REDACTED

1 Q REDACTED

2 REDACTED

3 A Yes, sir.

4 Q So this is what you then heard with your  
5 own ears. You listened to them and you heard that

6 REDACTED

7 REDACTED

8 REDACTED

9 A Yes.

10 Q So looking back at Exhibit 7, now what  
11 you wrote -- I just want to pause here for a  
12 minute -- exhibit 20 is your document. You said  
13 that. Now, this portion of Exhibit 20 of your  
14 exhibit, where you said REDACTED

15 REDACTED

16 REDACTED

17 REDACTED

18 MR. KLEIN: Objection as to who wrote the  
19 other document. You can answer.

20 BY MR. MACGILL:

21 Q The REDACTED, for their part, in Exhibit  
22 7 confirmed what you said in your document in

1 Exhibit 20 when you described the REDACTED  
2 right?

3 MR. KLEIN: Same objection. You can  
4 answer.

5 THE WITNESS: Yes.

6 BY MR. MACGILL:

7 Q And let's talk about the specific  
8 REDACTED  
9 REDACTED If you look about four  
10 lines down on the REDACTED that is Exhibit  
11 7, do you see the sentence beginning REDACTED  
12 REDACTED

13 A Yes.

14 Q REDACTED  
15 REDACTED

16 REDACTED You understood that that was a  
17 rendition of what occurred by the REDACTED?

18 MR. KLEIN: Objection. Competence to  
19 speak to that, but you can answer.

20 THE WITNESS: That is what I understood  
21 based on this document.

22

1 BY MR. MACGILL:

2 Q And you understood that based on what  
3 the REDACTED told you at the time on March 31,  
4 2022?

5 A Yes.

6 Q And that is consistent with what you  
7 wrote in your Exhibit 20, right?

8 A Yes.

9 Q And in fact, I want to remind you of  
10 something. In your exhibit 20 not only was this  
11 in the document that the REDACTED prepared, you  
12 recited that for your part in your Exhibit 20,  
13 didn't you, REDACTED .

14 Do you see it?

15 A Yes.

16 Q And what you wrote -- you repeated  
17 this -- you said, REDACTED

18 REDACTED

19 REDACTED

20 REDACTED

21 REDACTED You recorded that in your  
22 Exhibit 20, right?

1           A     Yes.

2           Q     Now, ma'am, none of these details -- to  
3     repeat -- not one of these details that we just  
4     covered appears in the final Guidepost report,  
5     does it?

6           A     I would have to see the report. I don't  
7     know.

8           Q     Ma'am, I'm going to hand you Exhibit 8  
9     from yesterday. I'm going to open it for your  
10    reference to page 153.

11                   And ma'am, I've handed you now, Exhibit 8,  
12    and I've opened it to page 153. Do you see that?

13          A     Yes.

14          Q     Focusing on this topic of who forgave  
15    who, the final report which is Exhibit 8 on page  
16    153 makes a specific reference to forgiveness,  
17    doesn't it?

18                   MR. KLEIN: I'm going to object and just  
19    allow the witness the opportunity to read other  
20    portions of the document if she feels that will help  
21    her answer your question in proper context.

22



1 BY MR. MACGILL:

2 Q We are just focusing on this at this  
3 point, ma'am. Do you have that in front of you?  
4 Do you have page 153 in front of you?

5 A I do.

6 Q And do you see where there's a reference  
7 to forgiveness?

8 A Yes.

9 Q And do you see that there's a reference  
10 on August -- in the final Guidepost report,  
11 Exhibit 8: On August 5, Mr. Blankenship brought  
12 Dr. Hunt, his wife, pastor, and survivor in for  
13 another meeting at Hope Quest, a counseling  
14 ministry to bring closure to the events on the  
15 25th of July.

16 Do you see that?

17 A Yes.

18 Q Dr. Hunt and Mr. Blankenship stated they  
19 could never talk about what happened and if they  
20 did it would negatively impact over the 40,000  
21 churches Dr. Hunt represented.

22 Do you see that?

1           A     Yes.

2           Q     And then ma'am, the sentence that I want  
3     to focus you on, in contrast to what was written  
4     by the REDACTED and in contrast to what was written  
5     by you in Exhibit 20, it says -- the report says:  
6     "Dr. Hunt asked for pastor's forgiveness, and  
7     pastor said he agreed.

8                     Do you see that?

9           MR. KLEIN:  Objection as to your  
10    characterization of the facts.  You can answer.

11   BY MR. MACGILL:

12          Q     Let me restate just so we're clear and  
13    there's a -- we obviate the objection on this  
14    important point of your testimony.

15                  So ma'am, the jury can see this on the  
16    screen here in the courtroom today, and what I want  
17    the jury to focus on is the following sentence:  
18    Dr. Hunt asked for pastor's forgiveness and pastor  
19    said he agreed.

20                  That is the language of the final  
21    Guidepost report, isn't it?

22          A     Yes.  The report says Dr. Hunt asked for

1 Pastor's forgiveness and pastor said he agreed.

2 Q And you will admit without any  
3 equivocation on your part that that is different  
4 from what you wrote on your own computer in  
5 Exhibit 20.

6 MR. KLEIN: Objection as to form. You can  
7 answer.

8 THE WITNESS: The words are different.

9 BY MR. MACGILL:

10 Q Okay. And then --

11 A But --

12 Q Okay. Please continue. The words are  
13 different but what?

14 A The words are different, but on the  
15 Exhibit 20 where it says REDACTED

16 REDACTED

17 REDACTED

18 REDACTED

19 REDACTED

20 Q Now, let's talk about -- perhaps what  
21 the jury might find to be licenses that you took  
22 in connection with the final report yourself and

1 those acting in concert with you --

2 MR. KLEIN: I'll object to that  
3 non-question. You can ask now a question.

4 BY MR. MACGILL:

5 Q Okay so --

6 MR. KLEIN: I just want to make sure it's  
7 a question, Rob -- that's all -- that she's getting.  
8 That was a statement it appeared to me. That's all.

9 MR. MACGILL: That's fair.

10 BY MR. MACGILL:

11 Q So let me see -- make sure I can  
12 understand. I want to focus very specifically  
13 here at this point on your testimony. So I want  
14 to focus again on the Guidepost report. Okay?  
15 This particular sentence. And I want to compare  
16 it now not to what you wrote in Exhibit 20; I want  
17 to compare it what the REDACTED wrote in Exhibit 7.  
18 Okay? Do you understand where we're going?

19 A Yes, sir.

20 Q All right. Now, making sure we're  
21 really cautious and very careful about all of this  
22 and very literal as counsel has insisted, which is

1 fair, I want to now very carefully go through what  
2 the REDACTED wrote in Exhibit 20 -- 7. And in  
3 Exhibit 7, just to remind this jury, what it says  
4 is REDACTED

5 REDACTED

6 Do you see that?

7 A Yes.

8 Q And ma'am, I've put that up on the  
9 courtroom -- on the screen here in the courtroom  
10 so the jury can see that. REDACTED

11 REDACTED

12 REDACTED Okay. That's up.

13 Now, let's put this -- let's compare this  
14 to what the Guidepost report said. The Guidepost  
15 final report, Exhibit 8, page 151, says  
16 Mr. Blankenship -- well, it says the following:  
17 Dr. Hunt asked for pastor's forgiveness, and pastor  
18 said he agreed.

19 That's what the report says, right?

20 A Uh-huh.

21 Q And you'll agree, ma'am, that what the  
22 REDACTED wrote in Exhibit 7 is different from what

1 the Guidepost final report says on the issue of  
2 forgiveness, right?

3 MR. KLEIN: Objection. Asked and answered  
4 you can answer.

5 THE WITNESS: The words are different.

6 BY MR. MACGILL:

7 Q Okay. Now, ma'am, I want to ask you a  
8 few other things about your work. If we look now  
9 at -- let me ask this first. Did you participate  
10 in the answering of interrogatories in this case?

11 A I did work with counsel, yes.

12 Q I'm going to hand you Exhibit 1. Did  
13 you participate in preparing these answers, ma'am?

14 A I participated in providing some  
15 answers. I don't recall seeing the final version  
16 of this document.

17 Q Of that document. All right. Could you  
18 hand me back the exhibits. I don't want to have  
19 too many papers in front of you. I'd like to  
20 bring some more documents to you, but could you  
21 hand me back these exhibits, please?

22 A All of them?

1           Q     Yes, please. And I'm going to hand you  
2 another one here. Okay?

3           A     Uh-huh.

4           Q     And by the way, I think I had mentioned  
5 that the -- in the last question that the  
6 quotation "Dr. Hunt asked for pastor's forgiveness  
7 and Pastor said he agreed," I made reference to  
8 that as being the Guidepost final report on  
9 page 151. It was actually page 153.

10          A     That's correct.

11          Q     Okay. Sorry about that.

12                Now, ma'am, I want to talk about your work  
13 in some additional respects. I want to talk about  
14 whether REDACTED provided you with a REDACTED?

15          A     REDACTED did not provide me with a  
16 REDACTED.

17          Q     All right. I'm going to hand you the  
18 next Exhibit 9. I'm going to hand you Exhibit 9.  
19 Did you ever receive Exhibit 9 before?

20          A     Yes, I did.

21          Q     And when did you ask for this Exhibit 9?

22                MR. KLEIN: Objection as to form.

1 BY MR. MACGILL:

2 Q Yeah. Let me back up. Is this REDACTED  
3 REDACTED ?

4 MR. KLEIN: Objection as to form. You can  
5 answer.

6 THE WITNESS: My understanding is that  
7 this is REDACTED .

8 BY MR. MACGILL:

9 Q Tell the court how you got that  
10 understanding.

11 A My understanding is that my colleague,  
12 Russell Holske, received this and then -- I'm not  
13 sure -- then I received it in some fashion. I  
14 don't know if it was through email or through a  
15 shared folder.

16 Q Did you yourself make any requests  
17 regarding the REDACTED ?

18 A I don't understand your question.

19 Q Did you use this REDACTED in connection  
20 with your work?

21 A Yes.

22 Q How did you use this REDACTED ?



1           A       But we reviewed all the documents that  
2 we were given.

3           Q       Now, the                REDACTED                ?

4           A        REDACTED

5           Q       And was there a forensic examination  
6 conducted by your company as to when the document  
7 was created?

8           A       I'm aware that there was a forensic  
9 analysis of what was provided, but I was not  
10 personally involved in that.

11          Q       Did you come to understand what the  
12 forensic examination showed in terms of when this  
13 REDACTED was created?

14          A       I understood that it was created within  
15 a time frame I think REDACTED .

16          Q       You don't recall that the forensic  
17 examination showed that this document that you  
18 have in front of you, Exhibit 9, was created in  
19 the year REDACTED ?

20          A       That may be true.

21          Q       Did you ever learn yourself that this  
22 document was created in REDACTED ?

1           A       I did not. I don't remember. I really  
2 don't.

3           Q       Ma'am, with respect to your work, didn't  
4 you come to understand that your forensic team had  
5 specifically ascertained, at least according to  
6 them, that the data on the hard drive showed that  
7 this particular REDACTED was in fact created in the  
8 years       REDACTED       ?

9           MR. KLEIN: Objection as to form. Asked  
10 and answered. You can answer.

11           THE WITNESS: I did become aware of that.  
12 BY MR. MACGILL:

13           Q       And in fact, the final Guidepost report  
14 says that on page 153. It says -- I'll quote for  
15 you: "Guidepost has confirmed forensically that  
16 the data on the hard drive was in fact created in  
17 2009-2011, which corroborates the counseling  
18 relationship between Mr. Blankenship and the  
19 couple."

20                   Do you remember those words in your  
21 report?

22           A       I do.

1           Q     Now, you testified to this court today  
2     that you understood -- or that the REDACTED itself  
3     is stated to have started on     REDACTED     ; is  
4     that correct?

5           A     Yes. That's the date that's on the  
6     document that you gave me.

7           Q     May I see that document, please?

8           A     Yes.

9           Q     Thank you. And this is the Exhibit 9  
10    that I had just given you?

11          A     Yes.

12          Q     Okay. And the     REDACTED  
13    REDACTED     , right?

14          A     Yes.

15          Q     Now, did you have this document prior to  
16    the time the final Guidepost report was issued?

17          A     Yes.

18          Q     Now, as an investigator, your job was  
19    you were one of the lead investigators on this  
20    case; is that right?

21          A     That's true.

22          Q     And you were one of the lead

1 investigators with respect to the statements and  
2 the claims made as to the incident involving  
3 Pastor Johnny Hunt and REDACTED ; is that  
4 right?

5 A Could you restate that question?

6 Q Your work was focused, among other  
7 things, on Pastor Johnny Hunt, was it not?

8 MR. KLEIN: Objection as to form. You can  
9 answer.

10 THE WITNESS: Yes. I was assigned to that  
11 part of the investigation.

12 BY MR. MACGILL:

13 Q Now, in determinating Mr. REDACTED 's  
14 credibility -- strike that.

15 I take it as a part of your role as being  
16 a lead investigator that it was important, in fact  
17 critical to you, to make sure that you assessed the  
18 credibility of REDACTED in his reports to your  
19 and your company, right?

20 A Yes.

21 Q And let's emphasize the word critical.  
22 It was critical for you as a lead investigator to

1 determine the credibility of what REDACTED  
2 reported, right?

3 MR. KLEIN: Objection. Asked and  
4 answered. You can answer again.

5 THE WITNESS: Absolutely. It was  
6 important for us to determine credibility for each  
7 person that we interviewed.

8 BY MR. MACGILL:

9 Q Now, as you assessed in this critical  
10 matter of REDACTED 's credibility on Exhibit 9,  
11 did you challenge him in any way to say why do you  
12 have an August 2nd, 2010, date on Exhibit 9 when  
13 this document had been created during the year --  
14 at least in part during the year 2009?

15 MR. KLEIN: Objection as to form as to her  
16 personal competence to answer that. You can.

17 THE WITNESS: I don't know. I was -- I  
18 did not deal directly with Mr. REDACTED regarding this  
19 document.

20 BY MR. MACGILL:

21 Q But as a lead investigator, ma'am, you  
22 knew specifically that your own company had

1 identified that Exhibit 9 had been created in the  
2 year 2009 -- beginning in the year 2009, right?

3 MR. KLEIN: Objection as to form. You can  
4 answer that question.

5 THE WITNESS: That's what the forensic  
6 review showed, yes.

7 BY MR. MACGILL:

8 Q And you understood that before the  
9 Guidepost report was published, right?

10 A Yes.

11 Q And in fact, not only did you understand  
12 that, the Guidepost publication represented in  
13 fact that forensically your company had identified  
14 that Exhibit 9 was created in the years 2009  
15 through 2011, right?

16 MR. KLEIN: Objection. Asked and  
17 answered. You can answer again.

18 THE WITNESS: That is true.

19 BY MR. MACGILL:

20 Q With that context in mind, as your role  
21 as a lead investigator on this matter, didn't that  
22 concern you about the credibility of Mr. REDACTED

1 and the information in Exhibit 9 when you indicate  
2 -- when you see that it was not REDACTED  
3 REDACTED .

4 A That is something to consider and that  
5 we considered, but we don't know -- we don't know  
6 exactly when each word on that document was  
7 created.

8 Q Right. And because of that, you had to  
9 cast some doubt on what he was writing, correct?

10 MR. KLEIN: Objection as to form. You can  
11 answer.

12 THE WITNESS: That was one of the things  
13 that we had to evaluate as we were going through  
14 this.

15 BY MR. MACGILL:

16 Q And did you come to look at that  
17 Mr. REDACTED , at least at some point in time, asked  
18 your company, specifically Mr. Holske, to destroy  
19 documents?

20 A I am aware of that message.

21 Q That text message?

22 A Yes.

1           Q     You were aware specifically as you sit  
2     here this morning and testifying in this court  
3     that Mr. REDACTED , at least at one point in time,  
4     had sent a message to Mr. Holske asking to confirm  
5     that certain documents that he had provided had  
6     been destroyed "as requested."

7           A     I'm aware of that text message.

8           Q     And when did you become aware of that  
9     text message?

10          A     I'm not sure. I'd have to see the date  
11     of the text message.

12          Q     Who told you about that text message?  
13     And I don't want -- I don't want you to provide  
14     any communications with your counsel, but just did  
15     somebody other than your counsel tell you that or  
16     somebody other than Guidepost's counsel?

17          A     I can't recall who -- how -- I don't  
18     recall how I first learned about the text message.

19          Q     Okay. Let me ask another thing about  
20     the credibility of Mr. REDACTED . Did you learn he  
21     at one point asked to use Mr. Holske as a  
22     reference for a job at your company Guidepost?



1           A       I don't recall that. No, I don't.

2           Q       I'd like you to tell the jury here, now  
3 that you are here with us all this morning, do you  
4 believe that your company and you -- strike that.

5                   Do you believe that you yourself had an  
6 arm's length relationship with the REDACTED?

7           MR. KLEIN: Objection as to form. Calls  
8 for a legal conclusion. You can answer.

9           THE WITNESS: I believe that we had good  
10 rapport with the REDACTED.

11 BY MR. MACGILL:

12           Q       Now, if you had -- if you are assessing  
13 the credibility of a witness -- strike that.

14                   Is it your general experience, ma'am, in  
15 your line of work as a lawyer or as a person who is  
16 doing investigatory work, is it your experience that  
17 a credible witness needs to be interviewed perhaps  
18 as many as nine times?

19           A       I think a witness needs to be  
20 interviewed multiple times. Nine doesn't -- I'm  
21 not going to say nine times, but you need to have  
22 multiple encounters with the people that you are

1 interviewing.

2 Q How many encounters did you have Johnny  
3 Hunt on the sexual abuse, as you say it,  
4 allegations here?

5 A We had two.

6 Q When were they?

7 A We interviewed Mr. Hunt, I believe, at  
8 the end of April 2022 and the first week of  
9 May 2022.

10 Q But ma'am, the interview on April '22  
11 you did not raise the issue of the incident  
12 involving Mrs. REDACTED, right?

13 A We did not.

14 Q So the interviews -- the only interviews  
15 that you had -- you had only -- strike that.

16 You had only one interview with REDACTED  
17 REDACTED -- pardon me. Let's try a third time.

18 You had only one interview with Pastor  
19 Johnny Hunt pertaining to the allegations of REDACTED  
20 REDACTED; is that right?

21 A We had one interview with Mr. Hunt that  
22 was primarily related to the report from REDACTED

1 REDACTED. However, in the earlier interview with  
2 Mr. Hunt, we asked him about the pastor who had  
3 resigned from Rehobeth, and we did not refer to  
4 REDACTED, but it was Mr. REDACTED that we were  
5 asking about and gave him a time frame. And he  
6 said to us that he didn't know who that pastor was  
7 or anything about that. And --

8 Q And who was --

9 MR. KLEIN: I think she wasn't finished  
10 with her answer, Rob. If you could just allow her  
11 to finish her answer.

12 BY MR. MACGILL:

13 Q All right. Let's read the question back  
14 and the answer to extent you gave it, and then  
15 let's have to add to it.

16 MR. KLEIN: Hold on. She's in the middle  
17 of her answer. She doesn't need it read back. She  
18 understood the question.

19 BY MR. MACGILL:

20 Q Do you want it read back? Okay. Please  
21 Continue.

22 A So in our first interview with Mr. Hunt,

1 we asked him, without naming REDACTED , about a  
2 pastor that resigned and went on sabbatical in a  
3 specific time frame, which I believe was 2010.  
4 And he stated that he did not know who that pastor  
5 was, and he did not know anything about that. And  
6 we also, I believe, asked him if it was related to  
7 sexual abuse, and he said no.

8 At that point, based on the information  
9 that we had, we believed that Mr. Hunt was being  
10 untruthful with us about knowing the REDACTED even  
11 though we had not mentioned their name.

12 BY MR. MACGILL:

13 Q Okay. Let's make sure we understand  
14 what you just said. He was being untruthful --  
15 Pastor Johnny Hunt was being untruthful to you in  
16 April of 2022 because why?

17 A Because we asked him if he knew anything  
18 about a pastor who had gone on sabbatical at  
19 Rehobeth Baptist church in Georgia and whether he  
20 knew anything about that. And he said he did not  
21 know the pastor. He didn't know anything about  
22 that.

1           Q     All right. Why did you think that was  
2     an indication that he had been untruthful. You  
3     didn't name a pastor in your question, right?

4           A     Correct.

5           Q     And you -- tell the court and jury why  
6     you didn't name the pastor that you were asking  
7     him about so he would understand specifically what  
8     you were asking about? Why did you do that?

9           A     Well, part of our work, we try our best  
10    to keep survivor's names and those who reported  
11    abuse confidential. And at that point, we were  
12    trying to keep the REDACTED' information  
13    confidential until we were able to corroborate  
14    more of their story. And so that's why we didn't  
15    name the name.

16                   The reason we thought that he would know  
17    exactly who we were talking about is because we had  
18    information that there had been a longstanding  
19    relationship between the REDACTED and Mr. Hunt and  
20    that heave would know, because of his position in  
21    the Georgia Baptist world and the fact that he had  
22    been to that church, we had pretty good information

1       that he knew exactly who had been the pastor there  
2       at that time.

3             Q       You had pretty good information?

4             A       Yes.

5             Q       When you say you had pretty good  
6       information, what are you referring to?

7             A       Well, the REDACTED had shared with us  
8       about their relationship with Johnny Hunt, and  
9       Mr. Hunt had helped Mr. REDACTED get some positions,  
10      and I believe that they told us that they -- I  
11      can't remember which church this happened at,  
12      whether it was Mr. Hunt's church or the REDACTED's  
13      church, but that they had been in each other's  
14      churches in different ways.

15            Q       So the jury understands, I just want to  
16      follow up on your claim -- your claim that you had  
17      quote "pretty good information" to suggest that  
18      Pastor Johnny Hunt was untruthful in April of  
19      2022, right?

20                   MR. KLEIN:  Objection as to form, the word  
21      claim, but you can answer.

22

1 BY MR. MACGILL:

2 Q Well, let me restate.

3 You made a statement under oath just now  
4 to this court and to this jury that you had "pretty  
5 good information" that Pastor Johnny Hunt had not  
6 been honest with you in April 2022 during an  
7 interview; is that right?

8 A We felt like --

9 Q Is that right?

10 A Yes. I said that.

11 Q Okay. Now, when you had pretty good  
12 information about what you claim to be indicia of  
13 being untruthful, did you understand what church  
14 that pastor had founded in Georgia?

15 A Yes.

16 Q What was the name of that church?

17 A First Baptist Church, Woodstock.

18 Q First Baptist Church, Woodstock. All  
19 right. Where at the time of the interview did  
20 REDACTED , Pastor REDACTED , work?

21 A I believe at the time of the interview  
22 Mr. REDACTED worked at a church in Eastern North

1 Carolina.

2 Q And what church were you asking about  
3 when you made an inquiry in April 2022 about an  
4 unnamed pastor, did you make a reference to a  
5 specific church when you were talking to Pastor  
6 Johnny Hunt about some unnamed pastor? What  
7 church were you talking about?

8 A Rehobeth Baptist Church.

9 Q All right. Let's spell that together.  
10 Would you please spell it?

11 A R-E-H-O-B-E-T-H.

12 Q So Rehobet Baptist Church. Where is  
13 Rehobet Baptist Church?

14 A I believe there's an H on the end of  
15 that.

16 Q I'm sorry.

17 A I think there's an H on the end of that.

18 Q Rehobeh Baptist Church. Thank you. And  
19 where was Rehobeh Baptist Church located at the  
20 time of your inquiry?

21 A I don't recall. It's in Georgia.

22 Q It was in Georgia.



1           A       It's in Georgia.

2           Q       Now, let's just make sure we understand  
3 this. So you're saying that you had "pretty good  
4 information" that Pastor Johnny Hunt was being  
5 untruthful to you because you asked him about an  
6 unnamed pastor at Rehobeh Baptist Church; is that  
7 right?

8           A       Yes.

9           Q       In what year? What year did you ask?

10          A       2010.

11          Q       Okay. So let's set the scene. So  
12 you're interviewing Johnny Hunt how many years  
13 after the event that you were making an inquiry  
14 about this unnamed pastor?

15          A       2022.

16          Q       How many years?

17                 MR. KLEIN: Objection. The record will  
18 reflect that that's 12 years. I'll stipulate to  
19 that.

20          BY MR. MACGILL:

21          Q       Is that 12 years? I'm not very good at  
22 math. Is it 12 years?

1           A       Yes.

2           Q       Okay. So you had a conversation with  
3 Pastor Johnny Hunt 12 years after -- 12 years  
4 later about an unnamed pastor; is that right?

5           A       Yes.

6           Q       And you had a conversation with Pastor  
7 Hunt about -- you asked him what about events 12  
8 years ago and this unnamed pastor. What did you  
9 ask him in April of 2022?

10               MR. KLEIN: Objection. Asked and  
11 answered. You can answer again.

12               THE WITNESS: We asked him about a pastor  
13 who took a sabbatical and resigned in 2010 from that  
14 church.

15 BY MR. MACGILL:

16           Q       So in 2022 you asked Pastor Johnny Hunt  
17 about an unnamed pastor who had taken a sabbatical  
18 and resigned at the Rehobeth Baptist Church in the  
19 year 2010; is that correct?

20           A       Yes.

21           Q       Okay. Now, when you asked him that were  
22 you there in person with him?

1 A Yes.

2 Q Who was with you?

3 A Russell Holske.

4 Q What did he say when you asked him  
5 that -- let me ask -- let me back up.

6 Tell the court and jury exactly what you  
7 said to him when you made this inquiry.

8 MR. KLEIN: Objection. I believe that's  
9 been asked and answered.

10 BY MR. MACGILL:

11 Q Exactly this time, not generally.  
12 Please tell the jury what you asked Pastor Johnny  
13 Hunt during your interview of April 2022.

14 MR. KLEIN: I'll just note that there's no  
15 indication that she gave an exact or a general  
16 answer, but she can answer the question again.

17 BY MR. MACGILL:

18 Q Of course. We want your -- I want to  
19 make sure -- I don't want the lawyer speaking to  
20 influence you, any of them, any of these lawyers  
21 here in the room -- I just want you to answer for  
22 your own part. Please tell the jury exactly what

1 you asked Pastor Johnny Hunt in April 2022 during  
2 your meeting with him on this topic?

3 MR. KLEIN: Objection. Asked and  
4 answered.

5 THE WITNESS: I cannot give you the exact  
6 words I asked Johnny Hunt on that day. I've given  
7 you the summary of what was asked at that time.

8 BY MR. MACGILL:

9 Q One moment, please. Did you take notes  
10 of in interview of Pastor Johnny Hunt?

11 A Which one are you talking about?

12 Q The interview that you just indicated  
13 that you interviewed Pastor Johnny Hunt on April  
14 26th, 2022.

15 A Yes.

16 Q And did you type those notes up?

17 A Yes.

18 Q And this interview took place in  
19 Branson, Missouri; is that right?

20 A That's correct.

21 Q And when you created these notes did you  
22 create them at or near the time that the meeting

1 took place?

2 A Yes.

3 Q And did you review those notes in  
4 preparation for your testimony today?

5 A I don't -- no, I didn't.

6 Q You did not.

7 A I don't think I did.

8 Q Okay.

9 Now, just focusing on -- I want to ask you  
10 about your memory of this interview of Pastor Johnny  
11 Hunt. Did you interview him about whether Rehobeth  
12 Baptist Church had a history that included the abuse  
13 of several young boys?

14 A I don't recall the exact questions that  
15 we asked, but that may have been a question. I'm  
16 happy to look at the document.

17 Q No need, ma'am. Do you remember whether  
18 you asked during the interview of Pastor Johnny  
19 Hunt whether in fact the Rehobeth Baptist Church  
20 had a history that included the abuse of several  
21 young boys by a music minister named --

22 MR. KLEIN: Hold on. I'd ask you not to

1 the minister. I don't know if that document is  
2 identified as attorney's eyes only, Robert.

3 MR. MACGILL: It's not. It is not.

4 MR. KLEIN: I would ask, though, that the  
5 name of the minister not be revealed. I don't  
6 believe there's any need --

7 BY MR. MACGILL:

8 Q It's confidential. It is only  
9 confidential. It's going to be revealed here in  
10 this deposition. These are interview notes that  
11 she took of our client. They are going to be  
12 public.

13 MR. BUNDREN: Can you give me the Bates  
14 number?

15 MR. MACGILL: It's 441. Do you want to  
16 have a minute to look at this?

17 MR. BUNDREN: This is Hunt's documents?

18 MR. MACGILL: This is guidepost's.

19 Everybody all right?

20 MR. KLEIN: I just want to get a second  
21 just to -- because I don't have a copy. Do you have  
22 a copy of it to show me? I take you at your word.

1 MR. MACGILL: You take me at my word.

2 MR. KLEIN: Meaning that it is not  
3 designated at attorney's eyes only.

4 MR. MACGILL: Confidential. It's only  
5 confidential.

6 MR. KLEIN: So I'd ask that it remain  
7 confidential as described in the protective order.

8 MR. MACGILL: No objection to that.

9 BY MR. MACGILL:

10 Q All right, ma'am. So did you -- in your  
11 April -- so in your interview, ma'am, of Pastor  
12 Johnny Hunt did you ask him about whether the  
13 Rehobeth Baptist Church had a history that  
14 included the abuse of several young boys by a  
15 music minister, Mr. Frankie Wiley that came to  
16 light in 2012 when David Pitman made his case  
17 public?

18 A I don't recall.

19 Q Did you make reference in your meeting  
20 in April of 2022 with Pastor Johnny Hunt that  
21 Wiley is "known, confessed, to have molested many  
22 young boys while working as a music minister at

1 multiple Georgia Southern Baptist churches." Did  
2 you raise that with him, too?

3 A I don't recall if I raised that to him.

4 Q Did you say to him, ma'am, in contrast  
5 to what you testified to today, that there was a  
6 time in last -- in last 2010 when the pastor at  
7 Rehobeth stepped down. Did you make reference to  
8 that?

9 MR. KLEIN: Objection as to -- it  
10 mischaracterized her testimony, but you can answer.

11 THE WITNESS: Can you restate the  
12 question?

13 BY MR. MACGILL:

14 Q Did you specifically confer with Pastor  
15 Johnny Hunt and state to him specifically with  
16 respect to the Rehobeth Baptist Church that  
17 specifically "there was a time in last 2010 when  
18 the pastor of Rehobeth stepped down." Did you ask  
19 him that? Did you make mention of that?

20 A We did make mention of a pastor stepping  
21 down and going on -- going on sabbatical and  
22 stepping down.



1           Q     Now, you then said we understand that  
2     you came in to help Rehobeth in the interim and  
3     were recognized there for your efforts by Pastor  
4     Troy Bush in 2012. Do you remember referencing  
5     that?

6           A     I do remember referencing Troy Bush in  
7     that interview.

8           Q     Now, speaking of Troy Bush specifically,  
9     did you ask with respect to Mr. Bush, Mr. Troy  
10    Bush, do you know any of the circumstances as why  
11    that pastor left in 2010?

12          A     Can you repeat that?

13          Q     Do you remember writing or confirming --  
14    strike that.

15                Do you remember stating to Pastor Johnny  
16    Hunt asking him if he knew of the circumstances of  
17    why that pastor left Rehobeth in 2010?

18          A     We asked him about the pastor in 2010 if  
19    he knew why he left.

20          Q     So in 2012 do you remember recording in  
21    your interview notes -- strike that.

22                In 2022 in this interview do you remember

1 recording in the interview notes that Pastor Johnny  
2 Hunt does not remember the circumstances of that  
3 pastor leaving but remembers coming in to help that  
4 church. Do you remember making such a notation in  
5 your notes, ma'am?

6 A I do not specifically remember making a  
7 notation in my notes.

8 Q Okay. Now, and it's on the basis of  
9 what we just described that you claim today in  
10 your testimony that you feel that there was in  
11 your words pretty good information -- "pretty good  
12 information" that Pastor Johnny Hunt was not  
13 honest with you in the April 26, 2022 interview;  
14 is that right?

15 MR. KLEIN: Objection as to form. You can  
16 answer.

17 THE WITNESS: Yes.

18 BY MR. MACGILL:

19 Q Now, specifically in your notes you  
20 indicate -- in your own notes in this interview  
21 you indicate that Dr. Hunt stated -- strike that.

22 Now, in the final report, and you are

1 welcome to look at it, you indicated on page 158,  
2 that Dr. Hunt stated to you he did not know who the  
3 pastor was. Do you remember that?

4 MR. KLEIN: Before you answer, feel  
5 free -- if you need to look at the report, it's no  
6 longer in front of you.

7 BY MR. MACGILL:

8 Q Do you remember that?

9 A If you'll let me see the report.

10 Q Just first, do you remember that, and  
11 then we'll get into the report. Do you  
12 remember --

13 A Ask the question again, please.

14 Q Do you remember the final Guidepost  
15 report saying that Dr. Hunt stated he did not know  
16 who the pastor was that was referenced in this  
17 2010 event?

18 A Yes.

19 Q Now, in the interview you had in May  
20 before the report was published -- let's make sure  
21 we're precise -- after this interview on April 26  
22 that we just covered, you had an interview about

1 the allegations of the REDACTED with Pastor Johnny  
2 Hunt on May 10, 2022, right?

3 A I know that I had an interview with  
4 Johnny in May. I'd have to have my memory  
5 refreshed to give you the exact date.

6 Q But this was -- the only interview you  
7 had with Pastor Johnny Hunt on the allegations of  
8 the REDACTED was in May 2022?

9 A Yes. That second interview.

10 Q I'm going to hand you back Exhibit 1,  
11 the interrogatories answers, and I'm going to ask  
12 you to look at page 4 and ask if you can confirm  
13 the date.

14 A I believe that May 12 is correct as the  
15 date. So the date of your interview, the only  
16 interview that was conducted of Pastor Johnny Hunt  
17 by you or those at Guidepost was on May 12, 2022;  
18 is that right?

19 MR. KLEIN: Objection. Mischaracterizes  
20 her statement, but you can answer. You had said the  
21 only interview at all. You didn't focus it.

22 MR. MACGILL: Fair objection.

1 BY MR. MACGILL:

2 Q So counsel's corrected me. The only  
3 interview that you had ever of Pastor Johnny Hunt,  
4 dealing specifically with the allegations  
5 pertaining to the incident with REDACTED was  
6 on what date?

7 A May 12.

8 Q Now, with respect to that only  
9 interview -- and I want to focus on this issue  
10 about the 2010 pastor sabbatical and resignation.  
11 Okay?

12 Now, on this issue of the -- what Pastor  
13 Johnny Hunt had to say to you about the 2010  
14 sabbatical and resignation, in this interview on  
15 May 12, 2022, Pastor Johnny Hunt acknowledged to you  
16 at that time in that interview on this particular  
17 series of allegations that he knew the pastor,  
18 didn't he?

19 A He did.

20 Q So at that time then you knew that now  
21 that there was further context and more detailed  
22 context brought to your question of the 2010

1 sabbatical and resignation, he told you exactly  
2 what had happened, right?

3 MR. KLEIN: Objection as to form. You can  
4 answer.

5 BY MR. MACGILL:

6 Q Let me ask a better question. On  
7 May 12, 2022, Pastor Johnny Hunt explained to you  
8 that, yes, he did know the pastor that you had  
9 asked about in the 2010 period.

10 A He did.

11 Q Looking at the final report, you didn't  
12 confirm that in your final report, did you?

13 A I'd have to read the report.

14 Q Well, ma'am, at page 158 of the report,  
15 you said Dr. Hunt stated that he did not know who  
16 the pastor was, right?

17 A And I believe that that part of the  
18 report references in that first interview.

19 Q Okay. Let's talk about whether you were  
20 being fair or those acting in concert with you at  
21 Guidepost were being fair or not, now I'm going to  
22 hand page 158 of your report. Okay?

1           A       Uh-huh.

2           Q       Before I do that, let me ask you  
3 something, because everybody in this room, there's  
4 lots of lawyers here. We're all lawyers. You are  
5 still a practicing lawyer, right?

6           A       I am not practicing.

7           Q       Not practicing, but you are still a  
8 member of the bar; is that right.

9           A       Yes.

10          Q       In terms of your commercial  
11 relationships be it inside a company or outside a  
12 company, you need to be forthright in your  
13 transactions, do you not?

14          A       Correct.

15          Q       And you need to be acting in good faith  
16 to describe fully and fairly circumstances of your  
17 business, right?

18                   MR. KLEIN: Objection as to form.

19                   THE WITNESS: Yes.

20                   BY MR. MACGILL:

21          Q       So when to came to do your work at  
22 Guidepost, you understood that you needed to be

1 fair to the facts and the circumstances of your  
2 investigation, right?

3 A Yes.

4 Q And that was true whether you were an  
5 ordinary citizen or a lawyer, right?

6 A Yes.

7 Q And it was also true that you needed to  
8 be fair and full in your representation of facts  
9 as an investigator, right?

10 A Yes.

11 Q All right. Now, let's look at page --  
12 together -- let's look at page 158. And again,  
13 ma'am, what I'm going to do here in this case is  
14 I'm going to open it to page 158, and this is in  
15 Exhibit 8, and I'm going to hand to you page 158.

16 MR. KLEIN: In answering the question that  
17 comes, if you need to review other portions of the  
18 report, feel free.

19 BY MR. MACGILL:

20 Q All right. Are you there?

21 Now, ma'am, I'm going to refer you -- see  
22 that top paragraph? During the first interview, did



1 Dr. Hunt acknowledge?

2 A Yes.

3 Q Then if you continue down with that  
4 paragraph with that heading I just referenced, you  
5 make reference about seven lines down: Dr. Hunt  
6 stated he did not know who Pastor was or why he  
7 had resigned.

8 Do you see that?

9 A Yes.

10 Q Now, ma'am, you did not describe in the  
11 report, you or those acting in concert with you,  
12 you did not describe in the report specifically,  
13 that in the interview associated with this  
14 particular incident, in the second interview on  
15 May 12, 2022, Pastor Johnny Hunt acknowledged that  
16 he knew who the pastor was. You did not say that  
17 in this report, did you?

18 A In this report down in the third  
19 paragraph it says: In the second interview Dr.  
20 Hunt acknowledged this time that he knew Pastor.

21 Q Now, with respect to focusing further on  
22 this during the first interview, you said Dr. Hunt

1       stated that he did not know who Pastor was, right?

2           A       Correct.

3           Q       Why didn't you tell the readers of the  
4       report that you didn't disclose the name of the  
5       pastor in April of 2022?

6           MR. KLEIN:   Objection.   Asked and  
7       answered.   You can answer again.

8           THE WITNESS:   Restate your question,  
9       please.

10       BY MR. MACGILL:

11           Q       I'm sorry?

12           A       Restate your question.

13           Q       Why in that first paragraph did you not  
14       make specific reference that you for your part in  
15       that April interview did not make any reference to  
16       the particular or specific name of the pastor  
17       involved?

18           A       We did.   In line four it says:  
19       Investigators asked Dr. Hunt several questions  
20       about pastor's church without identifying pastor.

21           Q       Right.   And then when it came to your  
22       interview notes, what you wrote is the following:

1 Does not remember the circumstances of that pastor  
2 leaving, but remembers coming in to help that  
3 church. Right?

4 A Correct.

5 Q You put none of that information in this  
6 paragraph here, did you?

7 MR. KLEIN: Objection as to form.  
8 Mischaracterizes her testimony but you can answer.

9 THE WITNESS: We put in the report that we  
10 asked him questions about the pastor's church  
11 without identifying the pastor.

12 BY MR. MACGILL:

13 Q But ma'am, but the reality here is --  
14 and again we're going to give you the note -- hoe  
15 never denied knowing at any time the pastor,  
16 right?

17 MR. KLEIN: Objection as to form. Asked  
18 and answered. You can answer again.

19 THE WITNESS: Dr. Hunt stated that he did  
20 not know who that pastor was or why he had resigned.

21 BY MR. MACGILL:

22 Q Right. So were you -- in terms of the

1 impression you were attempting to create by those  
2 at Guidepost and those that acted with you at  
3 Guidepost, were you trying to convey in this  
4 paragraph at the top of page 158 that he was not  
5 honest or forthright in his answers to you.

6 MR. KLEIN: Objection as to any impression  
7 they were trying to create, but you can answer the  
8 question.

9 THE WITNESS: We were trying to report  
10 back the findings of fact that we discovered during  
11 our you investigation.

12 BY MR. MACGILL:

13 Q Ma'am, I'm going to hand you -- and then  
14 we're going to mark as the next exhibit -- 23.

15 (KILPATRICK Exhibit Number 23 was marked  
16 for identification.)

17 MR. SANDERS: This is going to be  
18 electronic. The Bates first page is GP 000434, and  
19 the last page is GP0000444.

20 BY MR. MACGILL:

21 Q So ma'am, Mr. Sanders is going to put in  
22 front of you an iPad with this document on it.

1 We'll provide a paper copy here in a few minutes.

2 Now, ma'am, are these your interview notes  
3 that you created associated with an interview on  
4 April 26, 2022?

5 A Yes. They appear to be.

6 Q And these are notes that you created at  
7 or near the time of the interview?

8 A Yes.

9 Q And did you circulate these to people at  
10 Guidepost?

11 A Yes.

12 Q Who did you send this document to?

13 A Russell Holske and I would have shared  
14 this document and then shared with -- I'm not --  
15 actually, I don't recall exactly who it got shared  
16 with past Russ and I.

17 Q We'll be reviewing later today some  
18 information that you sent to the CEO of the  
19 company. Do you remember sending in connection  
20 with your work some information to the CEO?

21 MR. KLEIN: Some information or this  
22 particular document.

1 MR. MACGILL: Some information.

2 THE WITNESS: Yes, I do remember sending  
3 some information to the CEO.

4 BY MR. MACGILL:

5 Q Looking at paragraph D that you were  
6 summarizing, did you summarize the scope of the  
7 investigation in your notes here at the bottom of  
8 page 1 at the top of page 2?

9 A Yes.

10 Q Now Roman II says that this is the  
11 summary where you summarize questions that he was  
12 asked about being an SBC president?

13 A I'm sorry --

14 MR. KLEIN: Can you just point to the page  
15 if you would.

16 BY MR. MACGILL:

17 Q Page 3, Roman II, you are summarizing in  
18 this section a portion of the interview where you  
19 were asking questions concerning being an SBC  
20 president; is that right?

21 A Yes.

22 Q And looking at Roman III on page 6, you

1 had questions about the Southern Baptist  
2 Convention Executive Committee questions, right;  
3 is that right?

4 A I'm trying to find where --

5 Q Page 6, Roman III?

6 A Okay. I'm at Roman III.

7 Q So the second part of your interview --  
8 the first part is what you've referenced, the  
9 first part of your interview with Pastor Johnny  
10 Hunt is you asked him questions concerning being  
11 an SBC president, right?

12 A We did.

13 Q The next section of a portion of your  
14 interview you've made reference had you've shown  
15 here is you had questions for Pastor Johnny Hunt  
16 about the Executive Committee; is that right?

17 A Yes.

18 Q And you summarized those questions and  
19 his answers on pages six and seven; is that right?

20 A Yes.

21 Q If you go to page -- the next portion of  
22 your interview with Pastor Johnny Hunt was

1       pertaining to Roman IV Bylaws working group.

2                       Do you see that?

3           A       Yes.

4           Q       Then the next section, Baptist Press  
5       Communication questions, that was also part of  
6       your interview, was it not?

7           A       Yes.

8           Q       And you summarize your questions and his  
9       answers there; is that right?

10          A       Correct.

11          Q       And then here you have review of Hunt  
12       post-presidency activity in the Roman VI?

13          A       Yes.

14          Q       And there you asked him about his own  
15       sabbatical; is that right?

16          A       Correct.

17          Q       You asked him about his work with FBC  
18       Woodstock; is that right?

19          A       Yes.

20          Q       You asked him about being -- you asked  
21       him about Roy Blankenship as well, agreed?

22          A       Correct.



1           Q       You also covered with him under this  
2       portion of the interview in this post-presidency  
3       activity, you spoke with him about the Rehobeth  
4       Baptist church history and its music minister; is  
5       that right?

6           A       Yes.

7           Q       And specifically, you spoke to him --  
8       you told him that you had understood that he had  
9       come to help the folks at Rehobeth in the interim  
10      and was recognized for his efforts as a pastor,  
11      right?

12          A       Yes.

13          Q       And then one question that you reference  
14      here, and did you ask him this question: Do you  
15      know any of the circumstances on why that pastor  
16      left the Rehobeth in 2010?

17                   Is that the question you asked him?

18          A       Yes.

19          Q       He answered you -- according to his  
20      answer, at least according to you, does not  
21      remember the circumstances of that pastor leaving  
22      but remembers coming in to help the church; do you

1 see that?

2 A Yes.

3 Q Now, you knew when you asked that  
4 question that you were asking about events 12  
5 years prior, right? Is that right?

6 A Yes.

7 Q And then you asked him about what Pastor  
8 Johnny Hunt had done to incorporate initiatives  
9 that involve sexual abuse; is that right?

10 A Correct.

11 Q And Roman VI, recommendations, closing  
12 comments, you summarized those recommendations and  
13 closing comments?

14 A In Roman VII?

15 MR. KLEIN: I believe you said six. Did  
16 you mean roman numeral VII, Rob?

17 MR. MACGILL: Yes. Roman VII.

18 MR. KLEIN: You said six. That's what's  
19 in the record.

20 MR. MACGILL: My mistake.

21 MR. KLEIN: That's okay.

22

1 BY MR. MACGILL:

2 Q Roman VI -- pardon me. You have two  
3 Roman VIIIs, do you not?

4 A Yes, you're right.

5 Q Okay. So Hunt-incorporated initiatives.  
6 That was part of your interview, right?

7 A Yes.

8 Q And then the second Roman VII is  
9 recommendation/closing, right?

10 A Correct.

11 Q Now, in these notes, now that you see  
12 them again. There's no express -- as you  
13 testified, you made no express reference to the  
14 allegations involving the REDACTED, right?

15 A Correct.

16 Q And with respect to this one question  
17 that you asked about this pastor, you got an  
18 answer within three weeks about whether he knew  
19 that pastor, right?

20 MR. KLEIN: Objection as to form.

21 BY MR. MACGILL:

22 Q Let me have a better question. Within

1 three weeks of you doing the interview on these  
2 general topics that we've now reviewed, Pastor  
3 Johnny Hunt did confirm to you that he knew about  
4 the pastor's sabbatical and resignation in 2010.

5 MR. KLEIN: Objection. Asked and  
6 answered. You can answer again.

7 THE WITNESS: Yes.

8 BY MR. MACGILL:

9 Q Now, I want to ask you about a comment  
10 you made to the jury and to the court here. You  
11 said that you had "pretty good information" about  
12 Pastor Johnny Hunt not being credible. Remember  
13 that testimony?

14 MR. KLEIN: Objection. I don't believe  
15 those were exact words, but her memory will control.

16 THE WITNESS: I said I had pretty good  
17 information that he might not have been truthful  
18 with us in that first interview when we asked about  
19 the pastor without identifying him.

20 BY MR. MACGILL:

21 Q Using your words, you had pretty good  
22 information Pastor Johnny Hunt might not have been

1 truthful when asked about that pastor in 2010?

2 A Correct.

3 Q Now, were you yourself and Guidepost in  
4 the business of reporting pretty good information  
5 that might not have been truthful in a report that  
6 would be made public to millions of people?

7 MR. KLEIN: Objection as to form. You can  
8 answer in your individual capacity, not behalf of  
9 the Guidepost if you can answer.

10 THE WITNESS: Please ask the question  
11 again.

12 BY MR. MACGILL:

13 Q Did you understand, ma'am, that you  
14 yourself were in the business of publishing to  
15 millions of people "pretty good information" that  
16 might not have been truthful?

17 A I was not in the business of publishing  
18 information to hundreds of people.

19 Q But you understood that this document,  
20 this was going to be published by Guidepost,  
21 right?

22 MR. KLEIN: Objection as to form. You can

1 answer.

2 THE WITNESS: Yes.

3 BY MR. MACGILL:

4 Q And you understood just by the nature of  
5 this, that this publication by Guidepost was going  
6 to reach millions -- to repeat -- millions of  
7 people, right?

8 MR. KLEIN: Objection as to form. You can  
9 answer.

10 THE WITNESS: I don't -- I don't -- I  
11 don't have an idea of how many people it would  
12 reach, but it was going to be published.

13 BY MR. MACGILL:

14 Q Okay. And you knew that there was going  
15 to be a detailed report which would be made  
16 public, right?

17 A Correct.

18 Q And for your part, you were comfortable  
19 for your part to include "pretty good information"  
20 that might not have been truthful in a report that  
21 you knew was going to be made public.

22 A So let me explain. You asked me after

1     that first interview with Mr. Hunt, that was my  
2     impression after that first interview. After we  
3     continued to interview and corroborate  
4     information, that information was then considered  
5     for the report. That -- what's in the report is  
6     not based on a single interview of him in April.  
7     It's based on the totality of the investigation we  
8     did.

9           Q     Right. And you had no evidence that he  
10    had been the untruthful with you on this topic  
11    once it was confirmed who the pastor was and what  
12    the year was, right?

13           MR. KLEIN:  Objection as to form.  
14    Mischaracterizes her testimony.

15           THE WITNESS:  Please repeat the question?

16    BY MR. MACGILL:

17           Q     When the full reality, the full  
18    disclosure by you about what you were actually  
19    asking about in terms of the pastor in 2010 was  
20    confirmed to Pastor Johnny Hunt, he told you  
21    exactly what the reality was, didn't he?

22           MR. KLEIN:  Objection as to form.

1 THE WITNESS: He -- he admitted that he  
2 knew who the pastor was, and we provided it in that  
3 second -- second paragraph of the report.

4 BY MR. MACGILL:

5 Q Right. And you were acting  
6 surreptitiously yourself in that interview in  
7 April 2022 when you did not disclose to him the  
8 particular pastor that you were asking about,  
9 right?

10 MR. KLEIN: Objection. Argumentative.  
11 You can answer.

12 THE WITNESS: I disagree with that  
13 characterization.

14 MR. MACGILL: You wanted --

15 MR. KLEIN: I'd ask you to just let her  
16 finish her answer, Rob, and then you can ask away.

17 BY MR. MACGILL:

18 Q You wanted to create a false impression  
19 to get a report out in the third week in May by  
20 virtue of saying that you had "pretty good  
21 information" that Pastor Johnny Hunt had not been  
22 honest in circumstances where you didn't even give



1 him the courtesy of telling him who the pastor was  
2 that you were asking about, right?

3 MR. KLEIN: Objection. Argumentive.  
4 Asked and answered. You can answer.

5 THE WITNESS: I disagree with your  
6 characterization.

7 MR. MACGILL: Okay. So we can go ahead  
8 and take a break.

9 VIDEOGRAPHER: We're off the record at  
10 10:35.

11 (Whereupon, a brief recess was taken.)

12 VIDEOGRAPHER: We're back on the record at  
13 10:53 a.m. You may proceed.

14 BY MR. MACGILL:

15 Q Now, I want to speak to you about your  
16 investigative approach here and those that worked  
17 in concert with you, including Mr. Holske. Fair  
18 enough? Do you understand?

19 A Yes.

20 Q Okay. Now, I want to focus on the way  
21 in which you conducted yourself with the REDACTED.  
22 I think you've confirmed earlier in your testimony

1 and you've seen with your own eyes what your  
2 company said about how many interviews you and  
3 Mr. Holske had, right?

4 A Yes.

5 Q And combined, you had nine interviews  
6 with the REDACTED?

7 MR. KLEIN: Objection as to form. You can  
8 answer.

9 BY MR. MACGILL:

10 Q Just by reference, I just want to ask  
11 you generally, do you remember approximately five  
12 interviews with the REDACTED.

13 MR. KLEIN: You said five. Did you mean  
14 nine, Rob.

15 MR. MACGILL: Yeah.

16 MR. KLEIN: And I apologize if I confused  
17 you.

18 MR. MACGILL: No. He's the police here.

19 BY MR. MACGILL:

20 Q Nine. Nine. Do you recall  
21 approximately nine?

22 A I don't recall an exact number. I know

1     that there were several instances where we  
2     interacted with the REDACTED.

3           Q     All right. Now, as you went -- let me  
4     just make sure we understand the background. As  
5     of April of 2022, did you as an investigative team  
6     at Guidepost have any new information about the  
7     sexual abuse allegations that had not already been  
8     brought to the attention of the SBC prior to  
9     Guidepost?

10          A     I don't know the answer to that.

11          Q     You don't think so?

12          A     I don't know.

13          Q     Don't know. Okay. Can you identify for  
14     the court here any instances of sexual abuse your  
15     investigative team had identified between October  
16     of 2021 and April 30 of 2022 that had not been  
17     already identified by the SBC prior to Guidepost's  
18     involvement.

19                 MR. KLEIN: Objection. Asked and  
20     answered. You can answer again.

21                 THE WITNESS: I don't recall.

22

1 BY MR. MACGILL:

2 Q Don't recall?

3 A Specifics, no.

4 Q Okay. Now, during the deposition today  
5 we're going to go through some documents, but I  
6 would ask you, if you are willing, to volunteer at  
7 any time any sexual abuse allegation that is new  
8 that you discovered prior to April 30, 2022, in  
9 your work. Okay?

10 A Okay.

11 MR. KLEIN: And I'm going to say you  
12 should answer the question asked and you don't need  
13 to volunteer anything. But you should fully answer  
14 whatever question Rob asks you.

15 BY MR. MACGILL:

16 Q So this is up to you, but would you be  
17 willing to provide me a name of any such person if  
18 it comes to mind?

19 A I'll answer your questions.

20 Q Okay. Fair enough. Okay. So what I'll  
21 do, just so we're clear, I don't want to violate  
22 any procedural requirements or anything that the

1 lawyers here are insisting on. So what I'll do is  
2 I'll periodically ask you, now that we've spent  
3 another hour, do you remember. Okay?

4 A Uh-huh.

5 Q I'm ask you just repeatedly that  
6 question. And Patrick Sanders, my colleague, will  
7 remind me to do that. All right? Fair enough?

8 A Uh-huh.

9 Q Okay. But remember, I'll be asking you  
10 about whether any new sexual abuse allegations  
11 came to light based on your many hours of work  
12 from October 2021 to April 30 of 2022.

13 MR. KLEIN: She's answered that question  
14 already, Rob.

15 MR. MACGILL: No, I know.

16 MR. KLEIN: So if you ask the  
17 same question --

18 MR. MACGILL: She said no. I'm just  
19 saying all I want to know is when we go through more  
20 documents does she remember something now.

21 BY MR. MACGILL:

22 Q Okay? Fair enough?

1           A       Fair.

2           Q       Now, as an investigator working in this  
3       Guidepost effort, I want to see if we can't be a  
4       little more specific about how you communicated  
5       with the REDACTED? Did you email them on matters  
6       of substance pertaining to the details of what  
7       happened?

8           A       I believe that we communicated with the  
9       REDACTED, some through text messaging. I think  
10       most of that was logistical in nature. There were  
11       probably some emails and then phone calls or Zoom  
12       or Teams -- Team calls.

13          Q       However, you'll admit now, right now  
14       while we're here with you under oath, that you  
15       emailed them about draft of the facts of the  
16       report?

17          A       Right.

18                 MR. KLEIN: Objection. I'm not sure that  
19       was her testimony, but you can answer that question.

20                 THE WITNESS: Yes, we did.

21       BY MR. MACGILL:

22          Q       Okay. So just to be clear, you didn't

1 just email pertaining to logistics of conferences  
2 or meetings or calls, you emailed with drafts of  
3 the facts of the report to the REDACTED?

4 MR. KLEIN: Objection. That  
5 mischaracterizes her statement, but you can answer.

6 THE WITNESS: I was referring to text  
7 messages being about logistics, not about emails.

8 BY MR. MACGILL:

9 Q Okay. But you admit you emailed the  
10 REDACTED and transmitted to them drafts of the  
11 facts of the report?

12 A We did.

13 Q You did?

14 A Yes.

15 Q I want you to compare now. Did you  
16 ever, ma'am, ever email a draft of facts to Pastor  
17 Johnny Hunt?

18 A No.

19 Q So it was one way as far as you were  
20 concerned. It was going to be draft of facts to  
21 the REDACTED, never draft of facts to Pastor Johnny  
22 Hunt, right?

1           A       There was never a request for Mr. Hunt  
2       to view -- see anything with the facts.

3           Q       Request or not you never gave him a  
4       draft of facts.

5           A       We never gave him a draft. The REDACTED  
6       requested to see a draft of their facts.

7           Q       Now, that would be inappropriate to give  
8       them a draft of the facts, would it not, as an  
9       Investigator working as you did in something as  
10      sensitive as this matter.

11               MR. KLEIN: Objection as to form. You can  
12      answer.

13               THE WITNESS: No.

14      BY MR. MACGILL:

15           Q       Now, we have in the room some esteemed  
16      lawyers representing the SBC Executive Committee,  
17      and on the phone are some lawyers representing I  
18      believe to SBC.

19               I want to know did you disclose to any of  
20      the entities, the Executive Committee or the SBC,  
21      that Guidepost, as a matter of its investigative  
22      approach was sending a draft of the facts for the



1 report to the REDACTED?

2 A I'm not aware of that.

3 Q Now, wouldn't it be fair, if you were  
4 going to be fair to the lawyers here in the room  
5 or their clients or the lawyers on the phone or  
6 their clients, to inform them that you are  
7 communicating with drafts of facts to REDACTED and  
8 REDACTED ?

9 A Please repeat the question.

10 Q Can you admit now that it would have  
11 been fair and appropriate to advise the SBC and  
12 the Executive Committee that you were sending  
13 draft facts to the REDACTED of the report?

14 MR. KLEIN: Objection as to form. You can  
15 answer.

16 THE WITNESS: No.

17 BY MR. MACGILL:

18 Q It wouldn't be fair?

19 A We were hired as an independent  
20 third-party investigator, which means that we  
21 control the methodology and the way that we  
22 approach our work. Who we interview, how we

1 interview, how we put a report together, and that  
2 all. They are not driving it and we don't -- we  
3 don't tell them how we're doing things.

4 Q Did you tell the Executive Committee or  
5 their lawyers or the SBC that you had interviewed  
6 the REDACTED on repeated occasions?

7 A I did not tell them anything.

8 Q Did anyone from your company to your  
9 knowledge advise the Executive Committee or the  
10 SBC that there were perhaps as many nine  
11 interviews of the REDACTED in connection with this  
12 investigation?

13 A I don't know what was told to the SBC.

14 Q One last question on this line. Now,  
15 with respect to the manner in which you did your  
16 work, did you disclose to the executive or they  
17 SBC that you had conducted a single interview on  
18 this incident of Johnny Hunt and that you had  
19 elected to have as many as perhaps nine interviews  
20 of the REDACTED individually or collectively?

21 A I did not have interaction with the  
22 Executive Committee or the SBC.

1           Q     Fair enough. To your knowledge, did  
2     anybody at Guidepost so inform the Executive  
3     Committee or the SBC?

4           A     I don't have any knowledge of that.

5           Q     Now, you spoke about your methodology,  
6     and you said the methodology was up to Guidepost;  
7     that is right?

8           A     Correct.

9           Q     And do you believe that the -- under the  
10    terms of engagement that you had been, as a  
11    company, entrusted to use appropriate  
12    investigatory techniques?

13          A     Yes.

14          Q     Did you believe, ma'am, that when you  
15    did your work that you were doing it pursuant to a  
16    chain of command inside Guidepost?

17               MR. KLEIN: Objection as to form. You can  
18    answer.

19               THE WITNESS: Yes.

20    BY MR. MACGILL:

21          Q     And the boss was?

22          A     Julie Myers-Wood.

1           Q     Julie Myers-Wood was the CEO at that  
2 time?

3           A     Yes.

4           Q     And was she involved in the manner in  
5 which you did your investigation yourself as one  
6 of the principal investigators?

7           A     I'm not sure what you are asking.

8           Q     Did she tell you what to do sometimes in  
9 your investigation?

10          A     We discussed matters at times with  
11 Ms. Myers Wood.

12          Q     And she would tell you what to do or, in  
13 some cases, what not to do, right?

14          A     I don't recall it being directives or we  
15 would -- we would meet and discuss the case on a  
16 sporadic basis.

17          Q     But there were times or one at least one  
18 time where she told you not to do certain things,  
19 right?

20               MR. KLEIN:  Objection as to form.  You can  
21 answer.

22               THE WITNESS:  I am not remembering

1 something specifically, but if you've got a document  
2 I'm happy to look at it and see if I remember.

3 BY MR. MACGILL:

4 Q Do you remember her telling you not to  
5 do certain things or to take certain steps to the  
6 REDACTED specifically in this investigation?

7 A I don't recall anything specific. But  
8 like I said, I'm happy to look at the document.

9 Q Do you believe that she would be in the  
10 best position to determine for the company  
11 Guidepost what was appropriate in terms of an  
12 investigatory technique as compared to yourself?

13 MR. KLEIN: Objection as to form.  
14 Competence. But you can answer.

15 THE WITNESS: I think that Julie is very  
16 competent and she is the CEO of the company.

17 BY MR. MACGILL:

18 Q She's the boss?

19 A Yeah. She's the boss.

20 Q And she would be better able to  
21 determine for the company what was an appropriate  
22 investigatory technique as to compared to one of

1 the investigators like yourself or Mr. Holske?

2 Fair statement?

3 A She would have the final word.

4 Q Now, I want to be little bit more  
5 specific. Do you recall writing an email to REDACTED  
6 REDACTED 11 days prior to the publication of the  
7 report, where you provided to him a draft of  
8 facts?

9 A I do recall us providing a draft of  
10 facts. I'd have to see documents to verify the  
11 dates.

12 Q And with respect to this is an  
13 investigatory technique, are you, fairly stated,  
14 way out of bounds at this point of any  
15 investigatory technique that would be advised by  
16 any accredited organization in providing a draft  
17 of facts to a complainant's husband?

18 MR. KLEIN: Objection as to form. You can  
19 answer.

20 THE WITNESS: No. We were communicating  
21 with the REDACTED together. And no, I would say we  
22 were not out of bounds. We had had conversations

1 and interviews with the REDACTED. And at any  
2 point -- we told the REDACTED at any point prior to  
3 us having to turn in the report, they could say no  
4 that they didn't want to be part of it.

5 So we provided a draft for the REDACTED ,  
6 not for them to change anything or to put in what  
7 they wanted. The final decision was ours. But we  
8 wanted to make sure to protect and respect REDACTED  
9 REDACTED's story and just make sure that we had  
10 gotten the facts correct and that if there was  
11 anything nuanced or that we had mischaracterized  
12 in some way we wanted to consider that.

13 BY MR. MACGILL:

14 Q Let's talk about exactly what you asked  
15 them. And one point, 11 days prior to the report  
16 being published, didn't you ask the REDACTED ,  
17 specifically REDACTED and REDACTED , to review the  
18 draft of facts, one, and to let those of you at  
19 Guidepost know if they had any corrections or  
20 clarifications or questions.

21 A If that's what you are reading from the  
22 email, then yes. But what I'm telling you is that

1 was to give them a chance to give us comments for  
 2 them to see and for them to make a final decision  
 3 whether they were going to participate. So part  
 4 of working with survivors is that you want them to  
 5 have the ability to say, no, I don't want to go  
 6 forward with this. And so we were giving her that  
 7 ability.

8 (KILPATRICK Exhibit Number 24 was marked  
 9 for identification.)

10 BY MR. MACGILL:

11 Q I'm going to hand you Exhibit 24. And  
 12 before we get to the details of Exhibit 24 --  
 13 before we get to the details of Exhibit 24, I want  
 14 to go back to the question at the time as of  
 15 May 11, your company has not a single sexual abuse  
 16 incident to report that is in addition or  
 17 different to what the SBC already had, right?

18 MR. KLEIN: Objection as to form. Asked  
 19 and answered.

20 MR. MACGILL: You may answer.

21 MR. KLEIN: You can answer. I'm sorry.

22 THE WITNESS: So when you look at the



1 engagement scope of abuse allegations involving EC  
2 members, at that point I was not aware of any other  
3 allegations other than this one.

4 BY MR. MACGILL:

5 Q Other than Pastor Johnny Hunt?

6 A Correct.

7 Q So as of May 11, 2022, you, as you sit  
8 here today, having prepared to testify, having met  
9 with the counsel here representing Guidepost for  
10 two days or during two days, you have no -- you  
11 cannot identify an additional sexual abuse  
12 allegation other than what the SBC already knew  
13 about as of this date May 11, 2022?

14 MR. KLEIN: And I just want to make  
15 sure -- and Rob is not asking you for this, but make  
16 sure that you are not revealing any communications  
17 between us and yourself. I'm mention that. He's  
18 not looking for that, but just make sure you don't  
19 mention that.

20 THE WITNESS: For the portion of the  
21 report that dealt with allegations of abuse against  
22 Executive Committee members, at that point I knew of

1 no other -- no other situations other than the  
2 situation with Mr. Hunt in that section.

3 BY MR. MACGILL:

4 Q And you know, even outside the realm of  
5 Executive Committee members, you knew of no other  
6 abuse allegations that the SBC did not already  
7 know about as of this date May 11.

8 A I don't -- I don't know about that  
9 question.

10 Q . you don't know of any other person.  
11 Your investigation didn't reveal any Executive  
12 Committee member or anyone else that was involved  
13 in any sexual abuse allegation that the SBC did  
14 not already know about at of this date, May 11.

15 A I don't -- I don't know that I can  
16 answer that. I don't know the answer to that  
17 question.

18 Q You don't have any person you can  
19 identify?

20 MR. KLEIN: Objection. I don't believe  
21 that was her testimony, but you can answer.

22 THE WITNESS: I don't -- I don't know the

1 answer to the question that you are asking.

2 BY MR. MACGILL:

3 Q Why?

4 A Well, the scope of our engagement in  
5 that first prong was abuse allegations involving  
6 Executive Committee members. The other -- the  
7 other things in our investigation were mishandling  
8 of abuse, mistreatment of survivors, retaliation  
9 resistance to initiatives, and those types of  
10 things.

11 Q Okay. I understand?

12 A Over the course of our engagement we  
13 received calls from reporters of abuse, and we had  
14 to sort through those to determine whether it fit  
15 into that top prong.

16 Q I see.

17 A But some of the people we talked about,  
18 the SBC may not -- that we talked to, the SBC  
19 might not know about. I don't know the answer to  
20 that.

21 Q I see. I now understand your answer.

22 Okay. So with that clarification we can move

1 forward. Now, you have Exhibit 24 in front of  
2 you. All right. Now, Exhibit 24, this is your  
3 REDACTED prior to the publication of the  
4 report, right?

5 A Publication on May 22nd.

6 Q Yes.

7 A Yes.

8 Q And you are sending this to REDACTED  
9 with a copy to your co-lead investigator; is that  
10 right?

11 A Yes.

12 Q And it is -- you attached the REDACTED '  
13 facts document, right?

14 A I did.

15 Q And you say to REDACTED -- this was  
16 addressed to not just REDACTED but to also REDACTED .

17 A Yes.

18 Q So let's set the context for the jury  
19 here. So this is a REDACTED , and this is a  
20 day after you had spoken to -- you yourself had  
21 spoken to REDACTED ; is that right?

22 A I'm want recalling exactly when I spoke

1 with her -- if I spoke with her before this or  
2 after this.

3 Q If you take a look at the  
4 interrogatories, the interrogatories show that on  
5 May 10, 2022, you talked to the complainant, you  
6 yourself by telephone.

7 MR. KLEIN: I don't believe she has  
8 Exhibit 1 in front of her. I can show her mine,  
9 Rob --

10 MR. MACGILL: Yeah, that would a good --

11 MR. KLEIN: -- to make it quick. And then  
12 if you can just ask your question again, Rob, once  
13 she had the document in from of her.

14 BY MR. MACGILL:

15 Q So you see complainant interview on  
16 May 10, 2022?

17 A Yes.

18 Q Does this remind you that you spoke to

19 REDACTED

20 A Yes.

21 Q And then so you say to them: REDACTED

22 REDACTED Do

1     you see that?

2             A       Yes.

3             Q       You spoke to both of them REDACTED

4     REDACTED on May 10?

5             A       I would have to look at my notes on  
6     that.

7             Q       But according to these interrogatories  
8     and this email you had done so?

9             A       If that's what's there, then yes.

10            Q       Okay. Then continuing, REDACTED

11                         REDACTED

12                         REDACTED                         Was this proposed  
13     language pertaining to Pastor Johnny Hunt and the  
14     REDACTED for the final report which was going to be  
15     published REDACTED later?

16            A       This was proposed language only for the  
17     facts that the REDACTED were aware of from their  
18     Interviews.

19            Q       But you, nevertheless, were giving the  
20     person you regarded as the complainant and you  
21     were REDACTED , were you  
22     not?

1           A       We were           REDACTED

2       REDACTED .

3           Q       Yeah.   And you were asking -- you were  
4 asking them to REDACTED -- you said,       REDACTED  
5 Right?

6           A       Yes.

7           Q       And then you were calling them to  
8 action.       REDACTED       right?

9                   MR. KLEIN:   Objection.   Asked and  
10 answered.   You can answer again.

11                   THE WITNESS:   Yes.

12       BY MR. MACGILL:

13           Q       Yes.   Now, looking at what you asked  
14 them to do, in this call to action REDACTED  
15 REDACTED you said:                   REDACTED

16       REDACTED

17                   Do you see that?

18           A       Yes.

19           Q       By that you meant       REDACTED  
20       REDACTED

21           A       If they have       REDACTED  
22       REDACTED

1                                REDACTED                                Yes.

2                Q        All right.    And                REDACTED

3                                REDACTED

4                A        Yes.

5                Q        And also tell -- you were                REDACTED

6                REDACTED        prior to the publication if the

7        Guidepost report, if                REDACTED                right?

8                A        Correct.

9                Q        Now, you then say:                REDACTED

10                                REDACTED                                Do

11        you see that?

12                A        Yes.

13                Q        When you said                REDACTED                you

14        are referring to you and the REDACTED?

15                A        No.    I was referring to myself and

16        Mr. Holske.

17                Q        But you addressed this to REDACTED and

18        REDACTED and you said in the last line                REDACTED

19        REDACTED weren't you referring to them?

20                        MR. KLEIN:    Objection.    Asked and answered

21        she can answer again.

22



1 BY MR. MACGILL:

2 Q Yeah. I think that's a fair objection.

3 Were you mistaken when you said to this  
4 court that when you said -- you said REDACTED and

5 REDACTED, in the last clause, you said, REDACTED

6 REDACTED You were not referring to you and REDACTED  
7 and REDACTED. Is that your testimony?

8 A That's correct.

9 Q Okay. So you were referring to we. Is  
10 that who? You and Mr. Holske and the Guidepost  
11 team?

12 A Myself, Mr. Holske, the Guidepost team  
13 would decide what got shortened, what went into  
14 the report, and like I said, we had talked to the  
15 REDACTED and had told them at any point they could  
16 decide that they did not want to move forward and  
17 that we would allow them to see a draft of the  
18 facts prior to moving forward.

19 Q But let's make it clear so there's no  
20 question about what you were doing here. You  
21 didn't ask them in a single line or word of this  
22 Exhibit 24 about whether they wanted to move

1 forward, did you?

2 A Not in this particular REDACTED .

3 Q No, ma'am. And had you intended to ask  
4 them whether they wanted to move forward or not,  
5 you as an investigator and as a citizen, would  
6 have taken care to say we're asking you now to  
7 tell us REDACTED before the publication of this  
8 report whether you want to move forward or not?

9 MR. KLEIN: Objection as to form. You can  
10 answer.

11 THE WITNESS: Please ask the question.

12 BY MR. MACGILL:

13 Q You didn't ask them whether they wanted  
14 to move forward, did you, in this REDACTED ?

15 A Not in this REDACTED .

16 Q And in fact, you asked something very  
17 different in this REDACTED . You didn't ask them  
18 whether they wanted to move forward. You called  
19 them to action by saying REDACTED

20 REDACTED

21 REDACTED . Those were your words, right?

22 MR. KLEIN: Objection. The REDACTED speaks

1 for itself. She can answer the question.

2 THE WITNESS: Yes. That's what I put in  
3 the REDACTED .

4 BY MR. MACGILL:

5 Q Now, it's worse than that, isn't it,  
6 because you not only REDACTED ,  
7 they gave you redline changes to the Guidepost  
8 document, didn't they?

9 A I'm not sure what you are referring to  
10 as it's worse than that.

11 Q It's much worse than you asking for  
12 REDACTED in sense that you  
13 received and utilized red lines to the Guidepost  
14 report from the REDACTED , did you not?

15 MR. KLEIN: Objection as to form. You can  
16 answer the question.

17 THE WITNESS: So --

18 BY MR. MACGILL:

19 Q Let me restate. What happened was you  
20 received and made changes to the Guidepost request  
21 made by the REDACTED , right?

22 A We received -- we received a red line

1 document back from the REDACTED.

2 Q And you used the red line?

3 A And we, Russell Holske and I, went  
4 through it line by line and considered everything  
5 they said and made decisions about what we were  
6 going to use and what we were not going to use,  
7 whether we felt like it lined up with the facts  
8 that we had found that they had shared with us or  
9 not. Most of it was more about just -- I don't  
10 know a good word for it. Like their -- they  
11 wanted a certain tone and wording. That was not  
12 something that we changed.

13 Q So ma'am, with respect to what happened,  
14 in fact, you and Mr. Holske was emailing about  
15 whether the draft report had "impact," right?

16 A I'm not sure what you are referring to.

17 Q So you exchanged some texts at this very  
18 point in time, did you not, that is a day after  
19 this email, you and Mr. Holske were texting one  
20 another, and Mr. Holske said to you that the --  
21 that the draft, even after edits, was "missing the  
22 impact," right?

1                   MR. KLEIN:  Objection as to form.  You can  
2                   answer.

3                   THE WITNESS:  I'm happy to take a look at  
4                   your document.

5                   BY MR. MACGILL:

6                   Q       You don't remember that?

7                   A       I don't remember that specifically.  I  
8                   mean I'm not saying -- there's a lot of  
9                   communication in this case about all different  
10                  types of matters unrelated to Hunt, so if you want  
11                  to let me look at the text message, I'm happy to  
12                  respond.

13                  Q       Now one other context before we go to  
14                  how you and Mr. Holske were acting at the time, I  
15                  want to focus on something different.  So at the  
16                  time that you asked for the facts to be reviewed,  
17                  the draft of facts to be reviewed by the REDACTED ,  
18                  you had not yet interviewed Pastor Johnny Hunt on  
19                  the issues pertaining to this matter, had you?

20                  A       I believe that his interview came just  
21                  after -- like it may have been May 12th I think.

22                  Q       Yes.  So you sent -- you sent Exhibit 24

1 before you interviewed Pastor Johnny Hunt on the  
2 incident, didn't you?

3 A That is correct. That's why it's called  
4 a draft because we knew that time was -- it was  
5 coming time for us to turn in a report on the  
6 14th.

7 Q Ma'am, how in the world can you act as  
8 an investigator in an independent investigation,  
9 draft the facts, send it to complaining parties,  
10 without having even interviewed Johnny Hunt about  
11 this incident. How could you do that?

12 A We did this because that was the order  
13 in which Mr. Hunt was available, and we knew that  
14 if Mr. hunt were available, then we were going to  
15 interview him, but we had to start getting some  
16 things written for deadlines. These things were  
17 not set in stone until we got the full  
18 investigation finished and were not submitted  
19 until we got everything done.

20 Q Now, if you look at the draft of facts,  
21 ma'am, you are very specific about the incident,  
22 are you not?

1 A Yes.

2 Q To be specific --

3 A Yes.

4 Q -- let me restate -- make a better  
5 question. Paragraph after paragraph after  
6 paragraph, before you interviewed Dr. Johnny Hunt,  
7 you make reference to the event as alleged by  
8 REDACTED and REDACTED , right?

9 A That's correct. This was solely based  
10 on their information.

11 Q How many paragraphs -- let's count them.  
12 How many paragraphs did you reference the events  
13 involving Pastor Johnny Hunt and REDACTED in  
14 this draft of facts before you met with pastor  
15 Johnny Hunt?

16 MR. KLEIN: Objection. The document  
17 speaks for itself. I would also ask -- and you  
18 haven't done so yet, Rob, I appreciate that -- that  
19 if we're going to quote from the document --

20 MR. MACGILL: We're not.

21 MR. KLEIN: Great. So then my only  
22 objection is the document speaks for itself. I

1 would ask you also, Ms. Kilpatrick, not to read from  
2 the document, but you certainly can answer Mr.  
3 MacGill's questions.

4 MR. BUNDREN: Mr. MacGill, can I ask a  
5 question?

6 MR. MACGILL: Yes.

7 MR. BUNDREN: Have you marked the email  
8 and the facts or just the facts.

9 MR. MACGILL: Both. The facts 13507  
10 through 13510.

11 MR. BUNDREN: Thank you.

12 BY MR. MACGILL:

13 Q Now, let's count together the number of  
14 paragraphs in this draft of facts that is attached  
15 to Exhibit 24.

16 A I believe there are nine.

17 Q Nine. Thank you. How many total  
18 paragraphs are there in your draft of facts?

19 MR. KLEIN: Objection. I think just asked  
20 and answered unless there was a miscommunication  
21 about the question.

22 THE WITNESS: There are nine.



1 BY MR. MACGILL:

2 Q So all nine paragraphs of this draft  
3 involve the incident as between REDACTED and  
4 Pastor Johnny Hunt, right?

5 A Yes.

6 Q All right. You sent this, as you've  
7 testified, just to add some context to the next  
8 question, so you sent Exhibit 24 before you met  
9 with Pastor Johnny Hunt, right?

10 MR. KLEIN: Objection. Asked and  
11 answered. You can answer.

12 THE WITNESS: Yes.

13 BY MR. MACGILL:

14 Q Just for context?

15 A Yes.

16 Q And let me hand you Exhibit 18. Do you  
17 have Exhibit 18 in front of you?

18 A Yes, I do.

19 Q Now, Exhibit 18. Is this a REDACTED  
20 REDACTED

21 REDACTED

22 A Yes.

1 Q And this is -- you see this? It's REDACTED

2 REDACTED Is this -- REDACTED

3 REDACTED

4 A I believe that's REDACTED

5 Q Yes, ma'am. And ma'am, we could show  
6 you the metadata, but the metadata confirms you're  
7 correct, that yes, that is REDACTED And then he

8 REDACTED

9 REDACTED

10 REDACTED

11 Do you see that?

12 A Yes.

13 Q All right. Now, so this is REDACTED

14 Is this -- are these edits -- have you gotten  
15 edits from the REDACTED at that point in time?

16 A I don't know the answer to that.

17 Q All right. Now, ma'am, your job, was it  
18 not, was to provide an independent investigation,  
19 right?

20 A Yes.

21 Q You were to report facts, right?

22 A Yes.

1           Q       You were not -- to repeat -- you were  
2 not, you nor your company, were not engaged to  
3 create REDACTED were you?

4           MR. KLEIN:   Objection as to form.   You can  
5 answer.

6           THE WITNESS:   I'm not sure -- no.   It was  
7 not our job to create REDACTED.   But I'm not sure what  
8 Mr. Holske actually meant by that.   You would have  
9 to asked him.

10          BY MR. MACGILL:

11          Q       That would not be up to the lawyers or  
12 you or anyone else.   The jury will make that  
13 determination.   But with respect to their role, I  
14 just want to ask you a couple follow-up questions.

15                 The jury, ma'am, will determine what Mr.  
16 Holske meant when he said that       REDACTED

17                 REDACTED                         Did you at that  
18 point, when you read with your own eyes that he was  
19 making reference about his feeling in this REDACTED

20                 REDACTED                         Did you feel  
21 compelled in a sense to raise your hand and say:  
22 Let's stop.   We're not, Mr. Holske, we're not

1 attempting to create REDACTED We're attempting to  
2 create an independent valid report.

3 Did you do any such thing?

4 MR. KLEIN: Objection as to form.

5 Compound question. You can answer.

6 THE WITNESS: Flow.

7 BY MR. MACGILL:

8 Q Now, I want to think about the other  
9 defendants in this case for a minute. You did not  
10 do that within Guidepost, you didn't raise your  
11 hand, so to speak, and say my co-lead investigator  
12 is searching for REDACTED I don't think we  
13 should do this.

14 But my question is, did you raise your  
15 hand, so to speak, and say we need to advise the SBC  
16 or the Executive Committee that we have an  
17 enterprise here that's working for REDACTED not  
18 independent report. Did you do anything like that  
19 as to the other defendants in this case?

20 MR. KLEIN: Objection. Mischaracterizes  
21 her testimony, but you can answer.

22 THE WITNESS: No, I did not.

1 BY MR. MACGILL:

2 Q At any point afterwards did you yourself  
3 or anybody at Guidepost reach out to the people of  
4 the SBC or the people of the Executive Committee  
5 of the SBC and say we've made a terrible mistake  
6 here. We weren't objective in our reporting and  
7 we now know, seeing with these documents and what  
8 we did at the time that we did the wrong thing  
9 here. We searched for REDACTED We searched for  
10 things like explosiveness. We apologize.  
11 Anything like that where you made an apology to  
12 the SBC.

13 MR. KLEIN: Objection. Mischaracterizes  
14 the testimony, but you can answer.

15 THE WITNESS: I never had communications  
16 with SBC or the EC.

17 BY MR. MACGILL:

18 Q Even after the fact when you see what's  
19 happened here in terms of what you did or how you  
20 did it, did you remember making any entreaty, so  
21 to speak, to apologize to the Executive Committee  
22 that we as a company were working and looking for

1     REDACTED explosiveness, those types of things.  
2     We apologize to you, the members of the Executive  
3     Committee?

4             MR. KLEIN: The fact that she answered  
5     doesn't mean you have to repeat the exact same  
6     question again. However --

7             MR. MACGILL: This is EC only, not SBC. I  
8     think they're different. I'll restate it.

9     BY MR. MACGILL:

10            Q     Did you make any -- let me just make  
11     sure -- maybe I misstated.

12            MR. KLEIN: I thought you said the same  
13     thing both times. She gave you an answer to that  
14     question.

15     BY MR. MACGILL:

16            Q     Did you make any apology at any point,  
17     yourself, did you take any steps yourself to reach  
18     out after the fact to the Executive Committee or  
19     the SBC about these events?

20            A     I have not had communications with the  
21     SBC or the EC about these events.

22            Q     One final question on the text. So with

1       respect to this       REDACTED       -- he said --

2       Mr. Holske says       REDACTED

3       REDACTED       And then you responded

4       by saying       REDACTED

5               Do you see that?

6       A       Uh-huh.

7       Q       You are were referring to the REDACTED from  
8       the REDACTED?

9       A       Yes.

10       Q       And you then say:       REDACTED

11               REDACTED

12       REDACTED

13               MR. KLEIN:   That's not what it said there.

14       It says       REDACTED       It does not say REDACTED

15       REDACTED

16               MR. MACGILL:   My mistake.

17               MR. KLEIN:   That's okay.

18       BY MR. MACGILL:

19       Q       REDACTED

20               REDACTED       That's your

21       word, right?

22       A       Yes.

1           Q     Now, had you done -- as of the time of  
2     this text, had you taken in and reviewed the edits  
3     from the REDACTED?

4           MR. KLEIN:  Objection.  I believe asked  
5     and answered.  But you can answer again.

6           THE WITNESS:  I don't -- I don't remember  
7     in the time sequence whether I had looked at their  
8     edits.  But from the point of that week of May  
9     through the time we turned in the report, we were  
10    constantly working on different parts of the report.  
11    So I can't give you specifics.

12   BY MR. MACGILL:

13          Q     But I think you had their edits by this  
14     time, didn't you?  Can't you tell by looking at  
15     the REDACTED?

16          MR. KLEIN:  Objection.  Asked and  
17     answered.  He's hoping for a different answer, but  
18     answer his question.

19          THE WITNESS:  I don't know the answer to  
20     that.

21   BY MR. MACGILL:

22          Q     Okay.  Fair enough.  Not hoping for -- I



1 know the facts. Okay?

2 MR. KLEIN: Objection. You are not  
3 testifying, so she is. So about the facts, if you  
4 are called to testify we'll hear your side of the  
5 facts, but at the moment it's only Ms. Kilpatrick.

6 MR. MACGILL: No. I'm just answering  
7 counsel. You wanted to know, and I'm telling you I  
8 know the facts, and you will too soon.

9 MR. KLEIN: I'm aware of the facts fully.

10 BY MR. MACGILL:

11 Q All right. So you -- will you stipulate  
12 that your company had these edits before the text?

13 MR. KLEIN: Logistically that your client  
14 lied about his conversation on May 12.

15 MR. MACGILL: He didn't.

16 MR. KLEIN: Well, then we won't have a  
17 stipulation. Let's just move forward, Rob. We can  
18 talk offline.

19 MR. MACGILL: You should -- you should  
20 stipulate -- okay. We'll make the proof that you  
21 should be admitting to.

22 MR. KLEIN: As will we.

1 (KILPATRICK Exhibit Number 25 was marked  
2 for identification.)

3 BY MR. MACGILL:

4 Q Exhibit 25. Do you see this is from  
5 REDACTED dated REDACTED

6 A Yes.

7 Q Tell this court when it was that he sent  
8 this to you.

9 A The REDACTED  
10 REDACTED

11 Q So look at the REDACTED  
12 REDACTED When did you send REDACTED  
13 REDACTED

14 A I can tell a time that REDACTED  
15 I can't see REDACTED

16 Q When did he send REDACTED

17 MR. KLEIN: You mean REDACTED

18 BY MR. MACGILL:

19 Q REDACTED

20 A REDACTED

21 Q All right. So that's after you had  
22 received this; is that right?

1           A       It was after this email had come in, but  
2       I can't give you -- I can't give you information  
3       as to when I actually looked at this, and we did  
4       anything with it.

5           Q       Now, ma'am, I am going to put up on the  
6       courtroom -- through the ELMO system here, I'm  
7       going to put up on the screen the attachment to  
8       Exhibit 25. This is -- just to repeat -- this

9                               REDACTED

10                   REDACTED                               Right?

11           A       Yes.

12           Q       And when you look at this, you can see  
13       that this is --               REDACTED               -- let me ask  
14       you this: Can you confirm that       REDACTED  
15       REDACTED that were described in the       REDACTED by  
16       Mr. Holske about REDACTED?

17                   MR. KLEIN: Objection as to her personal  
18       knowledge as to what Mr. Holske said, but you can  
19       answer.

20                   THE WITNESS: I don't know if this is what  
21       we was talking about or -- I don't know, or he may  
22       have been talking about something else.

1 BY MR. MACGILL:

2 Q Now, can you look at REDACTED that were  
3 provided by the REDACTED?

4 A Yes.

5 Q Are these REDACTED that you received on  
6 proposed language for the Hunt-REDACTED section by  
7 the REDACTED themselves?

8 A Yes.

9 Q Now, as an investigator could you tell  
10 the court and jury what your reaction was when you  
11 saw REDACTED ?

12 A I was a little -- I was a little  
13 frustrated.

14 Q Why were you frustrated?

15 A Because we -- our intent had been to  
16 send the REDACTED the facts for kind of fact check  
17 clarification, nuance, and we got back more  
18 suggestions or contributions from their standpoint  
19 than I expected.

20 Q All right. And in fact, they, in  
21 essence, rewrote your report -- your draft report,  
22 right?

1                   MR. KLEIN:  Objection as to form, but you  
2                   can answer.

3                   THE WITNESS:  They inserted significant  
4                   portions of text into our report.

5                   BY MR. MACGILL:

6                   Q       Did you consider that they had  
7                   essentially attempted to rewrite your report?

8                   A       It felt a little bit like that, yes.

9                   Q       Okay.  Now, with respect to it feeling a  
10                  little bit like that on May 12, that was reason  
11                  for you to stop and say this is a problem.  We've  
12                  got people who are not reporting objectively the  
13                  circumstances.  Right?

14                  MR. KLEIN:  Objection.

15                  BY MR. MACGILL:

16                  Q       Did you have that kind of reaction?

17                  MR. KLEIN:  My apologies.  Objection as to  
18                  form.  You can answer.

19                  THE WITNESS:  No.  I did not have that  
20                  opinion.

21                  BY MR. MACGILL:

22                  Q       So you will deny that any reasonable

1 person looking at this would have concluded that  
2 REDACTED and his wife at this time, REDACTED  
3 REDACTED, 10 days prior to the publication of the  
4 report had shown by this communication a lack of  
5 objectivity to say the least?

6 MR. KLEIN: Objection as to form. Calls  
7 for a legal conclusion. Argumentative. You can  
8 answer.

9 THE WITNESS: Please reask the question.

10 BY MR. MACGILL:

11 Q Looking at this you understood that  
12 there was an issue of credibility of the REDACTED  
13 at the time you received this document.

14 THE WITNESS: No, I did not. I did not  
15 see this as a credibility issue with the REDACTED.

16 BY MR. MACGILL:

17 Q You testified earlier that credibility  
18 is critical to everyone who is a witness,  
19 including the REDACTED, do you recall that line of  
20 testimony?

21 A That is correct.

22 Q Based on the REDACTED information and

1 the details that they provided, you understood  
2 that when you saw this -- this document that had  
3 been sent to you on REDACTED, that there was a  
4 credibility concern at least.

5 MR. KLEIN: Objection. Asked and  
6 answered. You can answer.

7 THE WITNESS: There was not a credibility  
8 concern with this document.

9 BY MR. MACGILL:

10 Q Don't you agree that any reasonable  
11 person, any reasonable person doing an  
12 investigation would look at this document and come  
13 to the conclusion that there was an issue of the  
14 REDACTED' credibility on the issues involving the  
15 incident and Pastor Johnny Hunt at the time they  
16 read with their own eyes this document?

17 MR. KLEIN: Objection. Same question  
18 that's been asked twice. It's asked and answered.  
19 You can answer one more time.

20 THE WITNESS: No.

21 BY MR. MACGILL:

22 Q I want to talk for a minute about the

1 SBC. When this came in did you put the SBC on  
2 notice or did your company put SBC on notice of  
3 this document and its contents?

4 MR. KLEIN: Objection. You are speaking  
5 on your individual behalf?

6 MR. MACGILL: Yes.

7 MR. KLEIN: If you know of conversation  
8 with people at Guidepost you can answer. Otherwise  
9 only answer in your individual capacity.

10 THE WITNESS: I did not have any  
11 communication with the SBC or the EC, and I'm not  
12 aware of any other communication that someone else  
13 may have had.

14 BY MR. MACGILL:

15 Q On this document once you received it?

16 A On that document.

17 Q Okay. Is the same true of the Executive  
18 Committee that you yourself nor anyone at  
19 Guidepost put the Executive Committee on notice of  
20 the contents of this particular document once it  
21 was received?

22 MR. KLEIN: Objection. That was not her



1 testimony, but she can answer that question if you'd  
2 like.

3 THE WITNESS: Please ask the question  
4 again.

5 BY MR. MACGILL:

6 Q Did you take any steps once you received  
7 this document to separately reach out to the  
8 Executive Committee of SBC to put them on notice  
9 of the contents of this document?

10 A No.

11 Q Do you know anybody at Guidepost that  
12 did?

13 A I don't have any information about that.

14 Q Now, after these events that we've now  
15 been covering involving you and the REDACTED and  
16 involving Mr. Holske and the REDACTED that we've  
17 just now been covering in your testimony, did the  
18 CEO become aware that you had been providing  
19 drafts of facts to the REDACTED?

20 MR. KLEIN: Objection. Asked and  
21 answered. You can answer.

22 THE WITNESS: I believe that she was made

1     aware. I mean, we were communicating with the CEO  
2     regularly on the status of where things were.

3     BY MR. MACGILL:

4             Q     Including these exchanges and providing  
5     drafts of facts to the REDACTED?

6             A     I believe that she was aware of this.

7             Q     Did you advise the CEO prior to sending  
8     this draft of facts on May 12 -- pardon me.  
9     Strike that.

10            Did you advise the CEO of Guidepost that  
11   you were going to provide a draft of facts on  
12   May 11, 2022, before you did so?

13            A     I believe that we did make her aware we  
14   were going to provide a draft of facts to them.

15            Q     Did she approve it before you sent  
16   Exhibit 24?

17            A     I don't recall whether we -- I don't  
18   recall whether she viewed this email before we  
19   sent it or not. I don't recall that part.

20            Q     But your recollection is that you got  
21   the CEO's approval before you sent Exhibit 24.

22            MR. KLEIN: Objection. Mischaracterizes

1 her testimony, you can answer.

2 THE WITNESS: I don't recall a direct  
3 approval from the CEO. I don't have a memory of  
4 that.

5 BY MR. MACGILL:

6 Q Do you recall -- did the CEO of the  
7 company Guidepost ever instruct you that you were  
8 not to send a draft of any Guidepost report for  
9 line by line edits to the REDACTED.

10 A I don't recall anything like that.

11 Q Okay. But whether that happened or not,  
12 you did send to the REDACTED for review a draft of  
13 facts and potentially line-by-line edits when you  
14 asked for REDACTED  
15 in Exhibit 24?

16 A I did send them a draft of the facts.  
17 It was not for a line-by-line corrections from  
18 them, but I did send it, and that's what I got  
19 back.

20 Q Okay. You anticipated my next question.  
21 Whether you asked for it expressly or not in  
22 Exhibit 24, what you got back was line-by-line

1 edits on the 12th of may?

2 A Correct.

3 Q From the REDACTED.

4 A Yes.

5 Q Okay. Now, do you remember telling  
6 Mr. Holske -- well, let me hand you Exhibit 26.

7 (KILPATRICK Exhibit Number 26 was marked  
8 for identification.)

9 Now, I'm asking you read the REDACTED  
10 There's REDACTED at the bottom I want to ask you  
11 about on REDACTED

12 Do you see that?

13 A Yes.

14 Q All right. Now, this is REDACTED

15 REDACTED

16 REDACTED

17 is that right?

18 A Yes.

19 Q All right. And so you shared the draft  
20 of facts with the REDACTED , right?

21 A Yes.

22 Q And then they came back to you with line

1 edits, line-by-line edits, right? REDACTED

2 MR. KLEIN: Objection. Asked and  
3 answered. But if you are leading to a question,  
4 I'll let you move there. You can answer.

5 THE WITNESS: Yes.

6 BY MR. MACGILL:

7 Q All right. So then you took the REDACTED  
8 line-by-line edits and created your own document,  
9 right?

10 MR. KLEIN: Objection as to who the we is,  
11 but you can answer.

12 BY MR. MACGILL:

13 Q You created your own draft of facts  
14 that's REDACTED

15 A I -- I -- I did this proposed language  
16 for the Hunt-REDACTED that's REDACTED

17 Q All right. And your intention -- or  
18 strike that.

19 And Mr. Holske's intention then was to  
20 then follow up with REDACTED

21 REDACTED

22 REDACTED

1 MR. KLEIN: Objection. Personal  
2 knowledge. Document speaks for itself you can  
3 answer.

4 THE WITNESS: I mean, I can verify that  
5 that's what REDACTED but I don't have any  
6 recollection as far as a conversation about that.

7 BY MR. MACGILL:

8 Q Okay. So REDACTED

9 REDACTED

10 REDACTED

11 REDACTED

12 Do you see that?

13 A Yes.

14 Q And that's part of REDACTED

15 Take a look and see. Let me know.

16 And then does he continue: REDACTED

17 REDACTED

18 REDACTED

19 Is that right? Is that what he said?

20 A That's what REDACTED says, yes.

21 Q So did you understand from REDACTED

22 that he was going to REDACTED

1 REDACTED and provide this version to him now a day  
2 later or two days later.

3 MR. KLEIN: Objection as to form. You can  
4 answer.

5 THE WITNESS: All I have is REDACTED  
6 That's what it says.

7 BY MR. MACGILL:

8 Q Do you remember that that's what  
9 happened, that Mr. Holske in fact provided the  
10 REDACTED with yet another draft of facts for their  
11 review?

12 A I don't know what he -- I don't know  
13 what he did at that point and when he did it. But  
14 based on REDACTED he's saying that REDACTED  
15 REDACTED That's all I know.

16 Q You don't know if he did give them yet a  
17 second set of facts on May 13th or after?

18 A I do not have an independent  
19 recollection of that.

20 Q Okay. Now, you then responded REDACTED  
21 REDACTED right?

22 A Yes.

1 Q So REDACTED

2 then write back to him: REDACTED

3 REDACTED

4 Who is Julie?

5 A That would be our CEO.

6 Q And your CEO -- had you spoken to your  
7 CEO about sharing draft of the facts with the  
8 REDACTED ?

9 A I do not independently recall that  
10 conversation, but on REDACTED

11 REDACTED

12 Q Now, did she tell you -- did she tell  
13 you that REDACTED

14 REDACTED

15 REDACTED is that what she said?

16 MR. KLEIN: Objection. Asked and  
17 answered, but you can answer.

18 THE WITNESS: That is what REDACTED says,  
19 yes.

20 BY MR. MACGILL:

21 Q When did she tell you that REDACTED

22 REDACTED



1           REDACTED

2           MR. KLEIN:  Objection.  Just asked and  
3 answered.  You can answer again.

4           THE WITNESS:  I don't know exactly when  
5 that conversation occurred.

6 BY MR. MACGILL:

7           Q       Go back, if you would, to Exhibit 24.  
8 Do you still have that in front of you?

9           A       Yes.

10          Q       You sent a draft of facts on REDACTED  
11 Had the CEO of the company told you prior to  
12 May 11th that you were not to send drafts of facts  
13 to the REDACTED at that time?

14          A       I do not recall her telling us not to  
15 send a draft of facts at that time.

16          Q       Okay.  So is it you just don't know when  
17 she gave you the directive           REDACTED

18                   REDACTED

19          A       Correct.

20          Q       Now, as you look at this sequence of  
21 events, do you realize that as least as far as  
22 your CEO is concerned that you should never have

1 sent your email dated REDACTED , sending this  
2 document to the REDACTED .

3 MR. KLEIN: Objection as to form. You can  
4 answer.

5 THE WITNESS: No.

6 BY MR. MACGILL:

7 Q So you don't regard, as you sit here  
8 today, the directive from your CEO that you report  
9 in this particular email, Exhibit 25, that REDACTED

10 REDACTED

11 REDACTED you don't look at that as a  
12 prohibition to what you have done in Exhibit 24?

13 A No, I don't.

14 Q I'm sorry. I spoke -- it was Exhibit 26  
15 that is your REDACTED is that correct?

16 A Exhibit 26 is the REDACTED

17 Q Now, ma'am, I want to talk about the  
18 "critical" nature of the credibility of the  
19 REDACTED in general terms. Were you aware that  
20 REDACTED did not like his wife talking with  
21 other men?

22 A No.

1 Q Was he jealous with REDACTED?

2 A I don't recall that.

3 Q Do you recall him writing the following  
4 words: REDACTED

5 REDACTED .

6 MR. KLEIN: Objection. If you are reading  
7 from a document that is marked attorney's eyes only,  
8 I would ask that you not read it into the record.  
9 And so if you started to, that's -- we are where we  
10 are. But I would ask if you are reading from such a  
11 document that we then you stop, and then you have  
12 whatever options you want, Rob, to continue reading  
13 or to -- continue reading and put Mr. Hunt in a  
14 breakout room or not read from it.

15 MR. MACGILL: Hold on one minute.

16 MR. KLEIN: No problem.

17 MR. MACGILL: Pastor Hunt, I'd like you to  
18 go in a breakout room for about three minutes.

19 BY MR. MACGILL:

20 Q So ma'am, I want to -- if you -- may I  
21 have those exhibits back. I'll get those out of  
22 your way.

1 MR. KLEIN: Hold on one second. He's  
2 still showing on the screen. He's off. Thank you.

3 BY MR. MACGILL:

4 Q Ma'am, I want to hand you Exhibit 7,  
5 page 17, and do you recognize this as the report  
6 from the REDACTED themselves, that is the REDACTED and  
7 REDACTED story REDACTED

8 A Yes.

9 Q Now, as to the credibility -- and had  
10 you read this yourself?

11 A Yes.

12 Q And you read it in its entirety?

13 A Yes.

14 Q And you confirmed earlier to the court  
15 that you placed your notes on this particular  
16 document, right?

17 A I did.

18 Q And if you look at the REDACTED  
19 you see that there are REDACTED and  
20 he makes REDACTED -- or on  
21 REDACTED on this page 17, right?

22 A There is a REDACTED

1 REDACTED

2 REDACTED

3 Q And then what Mr. REDACTED wrote, and you  
4 read this -- REDACTED

5 REDACTED

6 Do you see that?

7 A Yes.

8 Q And you understood that Mr. REDACTED, Mr.

9 REDACTED

10 REDACTED?

11 MR. KLEIN: Objection. Lack of personal  
12 knowledge. You can answer.

13 THE WITNESS: I don't have the background  
14 for what he -- I just have what's on this piece of  
15 paper. REDACTED I don't have  
16 any of his knowledge as to what's behind what he  
17 wrote on this paper.

18 BY MR. MACGILL:

19 Q Right. But as an investigator you need  
20 to understand what REDACTED understood to be  
21 REDACTED right?

22 MR. KLEIN: Objection as to form. You can

1 answer.

2 THE WITNESS: I think that these are  
3 things that should be considered as part of the  
4 investigation, yes.

5 BY MR. MACGILL:

6 Q So you understood that Mr. REDACTED  
7 himself has described his REDACTED on this  
8 page 17.

9 A Yes.

10 Q Let's review what he said about himself.  
11 Everything written here on page 17 you knew prior  
12 to the publication of the report?

13 A I had read this document prior to the  
14 publication of the report.

15 Q And you knew that he said in his own  
16 words: REDACTED

17 Correct?

18 MR. KLEIN: Objection as to form. You can  
19 answer?

20 THE WITNESS: I read that in this report,  
21 yes.

22

1 BY MR. MACGILL:

2 Q You also had read his statement: REDACTED

3 REDACTED

4 You'd read that?

5 A Yes.

6 Q You also read: REDACTED

7 REDACTED

8 You read that.

9 A Yes.

10 Q REDACTED

11 REDACTED

12 Do you see that?

13 A Yes.

14 Q REDACTED

15 REDACTED

16 Do you see that?

17 A Yes.

18 Q REDACTED

19 His words?

20 A That's what's written here.

21 Q And you understood based on what you

22 wrote that he is also a REDACTED right?

1 MR. KLEIN: Objection as to form.  
2 Personal knowledge. You can answer.

3 THE WITNESS: I don't know him to be  
4 REDACTED I know that on this document he writes  
5 REDACTED

6 BY MR. MACGILL:

7 Q Okay. REDACTED  
8 REDACTED

9 Do you see that?

10 A Yes.

11 BY MR. MACGILL:

12 Q These are his words according to what he  
13 wrote, and you understood them to be his words,  
14 right?

15 MR. KLEIN: Objection as to form. Lack of  
16 personal knowledge.

17 THE WITNESS: He and REDACTED gave us this  
18 document and I can go -- it says up there REDACTED  
19 REDACTED and then this is what appears  
20 below.

21 BY MR. MACGILL:

22 Q Okay. REDACTED



1 REDACTED

2 REDACTED

3 Right?

4 A Yes. That's what's in the document.

5 Q And then in point 5, REDACTED

6 REDACTED

7 REDACTED REDACTED

8 REDACTED

9 Do you see that?

10 A Yes.

11 Q REDACTED

12 REDACTED

13 Do you see that?

14 A Yes.

15 Q Did this REDACTED self-description  
16 cause you any concern that you evaluated what  
17 Mr. REDACTED was saying?

18 MR. KLEIN: Objection as to form. Lack of  
19 personal knowledge. You can answer.

20 THE WITNESS: I think everything that was  
21 presented to us we took into account as data points  
22 as we formed our opinions in this matter.

1 BY MR. MACGILL:

2 Q And he also reports here: REDACTED

3 REDACTED

4 Do you see that?

5 A Yes.

6 Q So for your part, you were willing to  
7 assess him as being a credible person on the  
8 subject of REDACTED and the incident involved  
9 described to you that occurred 12 years prior with  
10 a gentleman who described himself this way on  
11 page 17 of this report.

12 MR. KLEIN: Objection as to form. You can  
13 answer.

14 THE WITNESS: Please restate the question.

15 BY MR. MACGILL:

16 Q You looked at Mr. REDACTED as credible in  
17 terms of the reports that he made about this  
18 incident involving his wife, notwithstanding what  
19 the jury can see here on the screen about what he  
20 wrote around himself on page 17?

21 MR. KLEIN: Objection as to form. Lack of  
22 personal knowledge. You can answer.

1           THE WITNESS: We made determinations of  
2     credibility based on what we heard REDACTED tell  
3     us in person, the way she described her encounter  
4     with Mr. Hunt in that condo. And all of these other  
5     things are data points that were considered as we  
6     worked on the matter. But REDACTED 's  
7     credibility in this matter was a significant piece  
8     of this report.

9     BY MR. MACGILL:

10           Q     I'd like you to admit some things or not  
11     as the case may be. Would you admit that REDACTED  
12     REDACTED thought that REDACTED had placed her affection  
13     on Pastor Johnny.

14           A     I don't remember him saying that, but  
15     that -- there's a possibility it could be in the  
16     document somewhere.

17           Q     All right. Do you admit that you  
18     understood that REDACTED was jealous of Pastor  
19     Johnny?

20           A     If you would like to show me a document,  
21     I'm happy to -- I mean there's so many pages in  
22     this. I don't have an independent recollection

1 specific to Mr. Hunt.

2 Q You don't. Okay. Fair enough. Did you  
3 understand that REDACTED was jealous with the  
4 success that Pastor Johnny had enjoyed in his  
5 ministries?

6 A I don't have a recollection of that.  
7 I'm not saying that that's not in a document  
8 somewhere, but I don't have an independent  
9 recollection of that.

10 Q And do you admit, ma'am, that REDACTED  
11 REDACTED was angry with Pastor Johnny's success?

12 A I don't.

13 MR. MACGILL: Take our lunch break.

14 VIDEOGRAPHER: Off the record at

15 11:59 p.m.

16 (Whereupon, a luncheon recess was  
17 taken.)

18 \* \* \* \* \*

19

20

21

22

A F T E R N O O N   S E S S I O N

(1:18 p.m.)

VIDEOGRAPHER: We are now back on the  
record at 1:18 p.m. You may proceed.

WHEREUPON,

SAMANTHA KILPATRICK  
was called for continued examination, and having  
been previously duly sworn, was examined and  
testified further as follows:

EXAMINATION BY COUNSEL FOR PLAINTIFF  
CONTINUED

BY MR. MACGILL:

Q Welcome back, ma'am. I want to -- I  
asked you a series of questions before the lunch  
break. You recall that I asked you whether REDACTED  
thought REDACTED had placed her infection on Pastor  
Johnny. Do you remember that line of questioning?

A Yes.

Q Do you recall, ma'am, that that question  
or that circumstance was specifically referenced  
in some of the materials that you read prior to  
publication of the report?

1           A       Yes.

2           Q       And you also read prior to the  
3 publication of the report that    REDACTED  
4 indicated he was jealous of Pastor Johnny  
5 specifically?

6           A       Yes.

7           Q       And you read with your own eyes that  
8    REDACTED       was jealous of Pastor Johnny's  
9 success, that you read that prior to the time of  
10 the publication of the report?

11          A       I don't recall. I don't recall. I may  
12 have read it. If you've got a document, I'm happy  
13 to take a look at it.

14          Q       Okay. If you take a look at page 36 of  
15 your report -- I'm sorry -- of the March 22nd,  
16 report. This is Exhibit 7. Do you have that  
17 exhibit?

18                   MR. KLEIN: She's has no exhibits in front  
19 of her.

20           BY MR. MACGILL:

21          Q       Got it. Ma'am, I've handed you Exhibit  
22 7 and I've opened it to page 36, and I'm going to

1 ask you about the REDACTED

2 REDACTED Are you there?

3 A Yes.

4 Q REDACTED

5 Exhibit 7, REDACTED

6 REDACTED

7 Do you see that?

8 A Yes.

9 Q What does the REDACTED refer to? Do you  
10 know?

11 A REDACTED

12 Q And you report here REDACTED

13 REDACTED Do you see that?

14 A I don't report here.

15 Q My mistake. But this report that you  
16 read prior to the publication of your report you  
17 saw this entry that REDACTED

18 REDACTED ?

19 A Yes.

20 Q And you saw the next sentence. REDACTED

21 REDACTED , right?

22 A Yes. That's what's in this report.

1 MR. KLEIN: Before you go any further,  
2 Rob, and my mistake for not seeing it earlier, that  
3 this is also an attorney's eyes only document you  
4 are reading from and Johnny Hunt is on there. So  
5 again, I did notice it when you started this line of  
6 questioning, so my apologies for that. But if you  
7 want to continue with specifics of this document  
8 like we did right before lunch, I would ask that you  
9 move Mr. Hunt into separate Zoom room.

10 MR. MACGILL: Understood.

11 MR. KLEIN: Thank you.

12 BY MR. MACGILL:

13 Q All right. So with respect to your  
14 understanding before the report was published, I  
15 want to have you confirm or not confirm your  
16 understanding on the motivations of the financial  
17 -- strike that.

18 Did you understand specifically that one  
19 of the REDACTED' goals in coming forward with the  
20 allegations of Pastor Johnny Hunt was financial?

21 A I understood from the REDACTED that their  
22 first concern was to make peace and make peace



1 with Johnny. And I believe that REDACTED  
2 listed out what their reasons for coming forward  
3 were, and I think to make things right -- or I  
4 think he may have used the word recompense was a  
5 part of what he told us.

6 Q Okay. So as you went through your  
7 process as far as REDACTED was concerned prior  
8 to the publication of the report you knew that he  
9 had expressed REDACTED right?

10 MR. KLEIN: Objection as to form.

11 THE WITNESS: I know that these documents  
12 reference REDACTED

13 BY MR. MACGILL:

14 Q That he had expressed -- you knew that  
15 he had expressed REDACTED

16 A In these documents, yes.

17 Q And you knew that he had expressed  
18 anger?

19 MR. KLEIN: Objection. I just -- if we're  
20 talking about the document, again, Rob, at least  
21 she's referencing the document so I just want to be  
22 careful -- it's not just you, Rob. I'm going to

1 caution my client as well if you don't find.

2 BY MR. MACGILL:

3 Q You knew -- just I want -- I'm not  
4 talking about the document now. You knew prior to  
5 publication of the report that REDACTED had  
6 expressed anger, right?

7 MR. KLEIN: So I just want you to answer  
8 without referencing the document if you can answer  
9 that question to the best of your ability.

10 THE WITNESS: Yes. REDACTED expressed  
11 anger.

12 BY MR. MACGILL:

13 Q And you also knew that that anger was  
14 expressed towards Johnny -- Pastor Johnny Hunt,  
15 right?

16 A Yes.

17 Q And you also knew prior to the  
18 publication of the report as far as Mr. REDACTED was  
19 concerned, that there were certain features of  
20 Johnny Hunt that were REDACTED to him, right?

21 MR. KLEIN: Again, without referring to  
22 the document --

1 BY MR. MACGILL:

2 Q Let me restate. I don't want you to  
3 refer to the document. You knew separate and  
4 apart from any documentation that you read prior  
5 to the report that certain features of Pastor  
6 Johnny Hunt and his work were REDACTED to Mr.  
7 REDACTED; is that right?

8 A Yes. They were REDACTED to both Mr.  
9 REDACTED and to REDACTED .

10 Q Okay. So you know there's REDACTED  
11 there's angry -- there's anger, there's

12 REDACTED and you also knew there was  
13 financial motivations of the REDACTED as far as  
14 Johnny Hunt was concerned, right?

15 MR. KLEIN: Objection as to form.

16 Mischaracterizes. But you can answer.

17 THE WITNESS: Please ask the question  
18 again.

19 BY MR. MACGILL:

20 Q You knew there was anger, you knew there  
21 was REDACTED you knew that there was a reaction  
22 of being REDACTED to Pastor Johnny Hunt as far as

1 the REDACTED were concerned. Did you also know  
2 that they had financial motivations in terms of  
3 Pastor Johnny Hunt.

4 A So I know that REDACTED had been  
5 mentioned in this document. I know that REDACTED and  
6 REDACTED were both REDACTED with the matters  
7 involving Mr. Hunt. I know that REDACTED expressed  
8 that he wanted for things to be made right. But  
9 we never spoke about financial stuff with the  
10 REDACTED.

11 Q Well, prior to the report being  
12 published, though, you had been advised and had  
13 learned that Mr. REDACTED, for his part, wanted some  
14 form of financial compensation, right?

15 A I had -- I know that he said that he was  
16 looking to make things right in recompense for the  
17 harm, but I don't know -- he didn't express  
18 directly to me what he wanted or what that meant.

19 Q Well, you reported in your report, your  
20 own memorandum, Exhibit 20, your memorandum from  
21 REDACTED you indicate that there was a goal  
22 in coming forward that was financial, right?

1 A REDACTED

2 REDACTED

3 Q So now you are admitting, are you not?  
4 And if you are not, tell us.

5 A That could be financial, yes.

6 Q Okay. All right. So let's make sure we  
7 understand. So as of REDACTED you know  
8 that one of the goals of the REDACTED in coming  
9 forward to give you information was financial,  
10 right?

11 MR. KLEIN: Objection as to form. You can  
12 answer.

13 THE WITNESS: I'm not sure exactly what I  
14 knew as of REDACTED I may have known that part. But  
15 I'm not for certain.

16 BY MR. MACGILL:

17 Q Let me see if I can remind you. I'm  
18 going to give you back Exhibit 20.

19 MR. KLEIN: As you are getting that, Rob,  
20 I would just note that this document is marked  
21 attorney eyes only, so it can be used to refresh her  
22 memory, but I would ask that neither you nor you,

1 Ms. Kilpatrick, read or reference specifically this  
2 document.

3 BY MR. MACGILL:

4 Q Now, ma'am, what we're going to do, you  
5 understand your company does not want Pastor  
6 Johnny Hunt to see the contents of your writings  
7 on -- in Exhibit 20. Do you understand that?

8 A Yes.

9 Q And they don't want to hear a word of  
10 what's in Exhibit 20.

11 A Okay.

12 Q Do you understand that?

13 A That's what you're telling me.

14 Q No. That's what they are telling us.

15 MR. KLEIN: Well, that's what the court  
16 has ordered at our -- based on our motion, the court  
17 order that so we have abided by the court --

18 MR. MACGILL: There is no order -- there  
19 is no order to that effect. We'll litigate that  
20 later, but there is no order that gives protection  
21 to your conduct here, counsel. So we're going to  
22 let -- we're going to make the arguments at a later

1 time. I don't want to represent it on this record  
2 that you have a court authority to do what you're  
3 doing because you don't. All right.

4 MR. KLEIN: There is an order in place.  
5 We would disagree maybe as to the interpretation of  
6 that order which we can leave for another time.

7 MR. MACGILL: Which is a pending motion.

8 BY MR. MACGILL:

9 Q Now, ma'am, regardless of whether  
10 counsel here is right to prohibit Pastor Johnny  
11 Hunt from seeing your memorandum in Exhibit 20,  
12 the fact is you knew that you are not allowed to  
13 speak the words of what you wrote on Exhibit 20  
14 while Pastor Johnny is hearing your testimony,  
15 right?

16 A Yes.

17 Q And you're told that -- this is what  
18 your lawyers have told you, right? The lawyers  
19 for Guidepost have told you.

20 MR. KLEIN: Without waiving privilege.  
21 I'm talking about right now if she's hearing me.  
22 She's certainly hearing me now that that is our

1 request based on our interpretation of the order.

2 Correct.

3 BY MR. MACGILL:

4 Q All right. So what we are going to do,  
5 ma'am, based on the fact that these lawyers and  
6 Guidepost will refuse to allow Pastor Johnny Hunt  
7 to hear your words or read your words, I'm going  
8 to ask you to refresh your memory.

9 A Okay.

10 Q I'm going to hand you Exhibit 20. And  
11 I'd ask you to turn to Bates number 7651.

12 Are you reading the document regarding the  
13 financial questions that I've asked you about? Do  
14 you see the REDACTED in the bullet  
15 point?

16 A I do.

17 Q All right. So now you know that -- and  
18 you can confirm now that you refreshed your memory  
19 that you understood as of REDACTED that one  
20 of the interests that the REDACTED had was to make  
21 a financial recovery, right?

22 A Yes.



1           Q     All right. And the jury will have --  
2     we're going to put this up on the board -- not the  
3     board -- the screen so the jury can see this. Now  
4     we put this up on the board so the jury can read  
5     along with us.

6                     And it's also true that you knew that  
7     there was not only financial motivation in the  
8     REDACTED but also that they wanted to seek  
9     specifically some form of REDACTED right?

10           A     I think that's the word I used earlier  
11     in my testimony is that that was -- that was  
12     something that they were seeking.

13           Q     So the words that you had heard from the  
14     REDACTED prior to publication of the report  
15     included the word REDACTED yes?

16           A     Yes. I read REDACTED

17           Q     Included the word REDACTED

18           A     Yes.

19           Q     Included the word REDACTED

20           A     Yes.

21           Q     Included the word financial interest?

22           A     There was communication about REDACTED

1       REDACTED

2           Q     Interest of the REDACTED?

3           A     I'm not sure exactly what words were  
4 actually used, but       REDACTED       were  
5 definitely used.

6           Q     Right. And the jury can see with their  
7 own eyes here that you -- what you've written in  
8 the report, right?

9           A     Yes.

10          Q     So prior to the publication of the  
11 report on the issue -- this critical issue  
12 described about the REDACTED -- strike that.

13               With respect to the critical nature of the  
14 credibility of the REDACTED, part of the publication  
15 of the report, you knew for your part as a lead  
16 investigator here, that you had seen in the REDACTED  
17 references to       REDACTED

18       REDACTED     right?

19               MR. KLEIN: Objection. Asked and  
20 answered. You can answer again.

21               THE WITNESS: Yes.

22

1 BY MR. MACGILL:

2 Q Now, let's just talk for a minute about  
3 these other parties. With respect to the  
4 Executive Committee did you make any reference to  
5 any one of these five circumstances that you came  
6 to learn prior to the publication of your report?

7 MR. KLEIN: Objection. Asked and answered  
8 with regard to communications with the EC, but she  
9 can answer.

10 THE WITNESS: I did not have any  
11 communications with the EC about what you just said.

12 BY MR. MACGILL:

13 Q Those findings?

14 A Right. Those words.

15 Q One more question with respect to the  
16 SBC, did you have any communications prior to the  
17 publication of the report about reference to

18 REDACTED

19 REDACTED

20 A I did not have any conversations with  
21 the SBC.

22 Q Same question follow-up. With respect

1 to these five forms of -- or five circumstances as  
2 far as the REDACTED was concerned, did you  
3 communicate internally to the CEO of your company  
4 or any executive at your company at this time,  
5 2022, about these specific circumstances that we  
6 just described to literally or figuratively raise  
7 your hand and a say, wait a minute, we need to not  
8 do what we're planning to do.

9 A Can you reask that question. It's  
10 multiple parts.

11 Q Sure. With all of this, reference to

12 REDACTED

13 REDACTED did you go to anybody in the  
14 management at Guidepost and say I am concerned  
15 about the core witnesses here, the REDACTED. Did  
16 you do anything like that?

17 A No.

18 Q Okay. Now, ma'am, I want to make sure  
19 the jury understands something else about what you  
20 did as an investigator or what your company did as  
21 an entity. You've described in your prior  
22 testimony the April interview of Pastor Johnny

1 Hunt in person. Do you remember that?

2 A Yes.

3 Q When it came time to confront Pastor  
4 Johnny Hunt about the incident involving REDACTED  
5 REDACTED, this was by videoconference, was it not?

6 A Yes.

7 Q How long did that video conference last?

8 A I don't remember how long it lasted.

9 Q An hour? Two hours?

10 A I would think it probably lasted around  
11 an hour.

12 Q Around an hour?

13 A I don't know.

14 Q Now, we'd like to see the video, ma'am.  
15 Did you take a video of this conference?

16 A No, we do not.

17 Q Why not?

18 A Because that's not the way that we do  
19 our videoconferences?

20 Q Well, if you were going to be fair to  
21 exactly to what Johnny Hunt said, why would you  
22 not create a video record and indicate to him just

1 very fundamentally something like, Pastor Johnny  
2 Hunt, we want you to be the first to know. We're  
3 going to record this interview so we'll have a  
4 record and you will too.

5 Did you do anything like that?

6 A No. We were not recording interviews.

7 Q But ma'am, you were planning in ten days  
8 time to produce information about an accusation by  
9 REDACTED . Why would you not give the courtesy  
10 and the respect to the pastor, Johnny Hunt, by  
11 simply doing this on video so there would be a  
12 record of what you said and a record of what he  
13 said.

14 A We did not video the interviews.

15 Q Now, instead, what you relied on were  
16 your notes and recollections of what he said to  
17 you, right?

18 A Yes.

19 Q And to err is human. Fair statement?

20 A Fair.

21 Q You may have made an error in what you  
22 said about what he said, right?

1           A       To err is human, and that's a  
2 possibility. That's why we have two interviewers  
3 on these interviews, so that we make sure that we  
4 take notes and don't miss anything.

5           Q       And if a human, you, or another human,  
6 Mr. Holske, were motivated to do something other  
7 than give the unvarnished truth, that could cause  
8 an error in the recording of what Pastor Johnny  
9 Hunt said, right?

10                   MR. KLEIN: Objection as to form. You can  
11 answer.

12                   THE WITNESS: If someone were motivated.  
13 But we were not motivated to do anything except to  
14 provide an independent third-party investigation,  
15 looking at the facts, looking for corroboration, and  
16 including that in our report.

17 BY MR. MACGILL:

18           Q       Well, if you were interested of being  
19 independent, why did you call the REDACTED after  
20 you called -- had a video conference with Pastor  
21 Johnny Hunt? Why did you do that?

22           A       We were coming down to the end of time

1 to where the report was going to be submitted, and  
2 we were having phone calls with all different  
3 types of people during that time frame. And I'm  
4 not sure how that phone call was scheduled. It  
5 was not scheduled to discuss our interview with  
6 Johnnie. It was scheduled probably to talk about  
7 their notes that they sent us.

8 Q It certainly occurred after the  
9 videoconference with Pastor Johnny Hunt, didn't  
10 it? Your call to the REDACTED. Same day.

11 A I would have to see -- I would have to  
12 see the dates on that if you would like to refresh  
13 my recollection.

14 Q Do you remember doing taped notes of  
15 that conversation with REDACTED after you spoke to  
16 Pastor Johnny Hunt on May 12th, 2022?

17 A Taped notes?

18 Q Let me back up. Let's talk about the  
19 chronology again. May 12, 2022, you had a  
20 videoconference with Pastor Johnny Hunt, right?

21 A Yes.

22 Q And the next day you had a conference --



1     you had another -- you had a telephone conference  
2     with the REDACTED, right?

3             A     I would have to look at the schedule. I  
4     don't recall exactly the sequence.

5             MR. MACGILL: Could you hand her Exhibit  
6     1, please?

7             MR. KLEIN: I believe you have the  
8     exhibits.

9     BY MR. MACGILL:

10            Q     All right. I'm going to hand you  
11     Exhibit 1. When did you -- you interviewed Pastor  
12     Johnny Hunt on May 12, right?

13            A     Yes.

14            Q     All right. And that was by video,  
15     right?

16            A     We had a virtual meeting by video. We  
17     did not video the call.

18            Q     Fair point. Tell the jury when you next  
19     spoke to the REDACTED?

20            A     It looks like we spoke with the REDACTED  
21     on the next day, May 13th.

22            Q     Do you recall why you spoke to the

1 REDACTED the day after you spoke to Pastor Johnny  
2 Hunt?

3 A If I remember, let me think for a  
4 second. I don't recall that conversation. I  
5 believe that there may be some notes to that, but  
6 I don't recall right now offhand what we spoke  
7 about.

8 Q I have an important question for you  
9 about what you wrote in the report. Did you  
10 misrepresent your conversation with Pastor Johnny  
11 Hunt the eligible in the Guidepost report?

12 A No.

13 Q In no res- -- are you denying that you  
14 misrepresented your conversation with Pastor  
15 Johnny Hunt on May 12th?

16 MR. KLEIN: Objection. Asked and  
17 answered.

18 THE WITNESS: No. I did not represent our  
19 conversation with Pastor Johnny Hunt.

20 BY MR. MACGILL:

21 Q You did not misrepresent?

22 A No, sir.

1           Q     Now, you realize that there are  
2 independent factors that indicate, at least by a  
3 common logic, that your statements about your  
4 report of the interview with Johnny Hunt make no  
5 sense as an independent validation. Right?

6           MR. KLEIN: Objection.

7           MR. MACGILL: Let me ask a better  
8 question.

9 BY MR. MACGILL:

10          Q     Evidence independent of what you said  
11 Johnny Hunt said shows that there was no sexual  
12 abuse or sexual assault in this case, right?

13          A     No. I don't believe that.

14 BY MR. MACGILL:

15          Q     A day or two later REDACTED asked  
16 Pastor Johnny Hunt to go on a jog with him, didn't  
17 she?

18          MR. KLEIN: A day or two later after when?  
19 After the conversation?

20 BY MR. MACGILL:

21          Q     After the incident -- after the incident  
22 that you reported in the Guidepost report. Just a

1     few days later     REDACTED     asked Johnny Hunt to  
2     go on a jog with him, didn't she?

3             A         That is what she shared with us.

4             Q         When did she share that with you?

5             A         The first time that we met with her.

6             Q         And as a reasonable person you thought  
7     that would be counterintuitive to a claim of  
8     sexual abuse, right?

9             A         Actually, no, I would not, because  
10    survivors often have future contact with their  
11    abusers. They are often traumatized and continue  
12    relationships for a long period of time with their  
13    abusers. And so that did not -- that did not  
14    surprise me at all. It's a factor. It's  
15    something to be considered but that did not  
16    concern me.

17            Q         So let's talk about other indicia of  
18    unreliability if the jury so considers them to be  
19    indicia of unreliability of your report. So in  
20    this case did you come to learn after the incident  
21    whether Johnny Hunt described this event to his  
22    wife?

1           A       Can you give me more reference?

2           Q       Did Johnny Hunt describe to his wife  
3 happened that evening with    REDACTED   ?

4           MR. KLEIN:   At any point in time.

5           MR. MACGILL:   Yeah.

6           MR. KLEIN:   If you know.

7           THE WITNESS:   I don't know.

8           MR. BUNDREN:   Are you waiving privilege on  
9 that conversation?

10          BY MR. MACGILL:

11           Q       When did you learn there was a  
12 communication involving    REDACTED   and Johnny  
13 Hunt after the event?   When first did they  
14 communicate again.

15           MR. KLEIN:   Objection as to form.   If you  
16 know.

17           THE WITNESS:   I'm not sure.   Like -- reask  
18 your question.   I'm not sure the time frame what  
19 you're asking.

20          BY MR. MACGILL:

21           Q       Was they a time after the incident where  
22 there was a meeting involving Pastor Johnny Hunt,

1       REDACTED , and her husband?

2           A       Yes.

3           Q       When?

4           A       We talked about meetings between REDACTED  
5 and REDACTED and Mr. Hunt along with Roy  
6 Blankenship.

7           Q       When?

8           A       When did we -- when did those happen?

9           Q       When did that meeting happen? Yeah.

10          A       We were told that those happened in  
11 August after the July time in Panama City.

12          Q       How long after?

13          A       I'm not sure how long after. Not -- not  
14 very long after.

15          Q       Did you report that in the Guidepost  
16 report?

17          A       I'd have to read the report. I know  
18 that we reported that there were two meetings.

19          Q       Two meetings with whom?

20          A       Two meetings that the REDACTED had with  
21 Pastor Hunt and Roy Blankenship.

22          Q       And it's your view that those meetings

1 were consistent with sexual abuse?

2 A Those meetings are not consistent or  
3 inconsistent with sexual abuse.

4 Q Now, what is your training on sexual  
5 abuse in terms of determining whether sexual abuse  
6 has occurred or not?

7 A So I have worked with survivors for most  
8 of my career, both in the prosecutor's office and  
9 in private practice. I've had many trainings on  
10 trauma. I'm actually a licensed marriage and  
11 family therapist and so I've had training on  
12 trauma and abuse. And so that includes just  
13 information about the way that survivors and  
14 abusers report abuse, the way they share it when  
15 they disclose it, and how to listen to that.

16 Q Now, with respect to the incident  
17 involving REDACTED and Pastor Johnny Hunt, how  
18 did you characterize that? Was it a sexual abuse  
19 event? What is the terminology that was used in  
20 the report?

21 MR. KLEIN: Objection to her terminology.  
22 You can answer in your individual capacity if you

1 know.

2 BY MR. MACGILL:

3 Q In the report.

4 MR. KLEIN: Objection. The document  
5 speaks for itself, but you can answer.

6 THE WITNESS: I would have to refer back  
7 to the document.

8 BY MR. MACGILL:

9 Q You don't recall, as you sit here,  
10 whether Guidepost characterized this event as  
11 involving sexual abuse or something else?

12 A I don't want to guess on the word that  
13 was used.

14 Q So there's a heading in this on page 149  
15 that says Allegations of Abuse Committed by the  
16 Executive Committee Members. Do you recall that  
17 heading?

18 A Yes.

19 Q Now, in the report the reference by  
20 Guidepost is that you found the sexual --  
21 Guidepost found the sexual -- strike that.

22 There's reference in the Guidepost report



1 to this incident involving Pastor Johnny Hunt and  
2 REDACTED as a sexual assault. Do you understand  
3 that's the language that was used in the Guidepost  
4 report?

5 MR. KLEIN: Objection. Asked and  
6 answered. You can answer.

7 THE WITNESS: Yes.

8 BY MR. MACGILL:

9 Q Now, did you agree to that language  
10 sexual assault?

11 A Agree to the language of sexual assault?

12 Q Right. The word -- these are words that  
13 were used in the report. Are these words that you  
14 agreed should be used.

15 A I do agree they should be used.

16 Q Did you at that time?

17 A Yes.

18 Q Now, what did sexual -- at the time you  
19 made that agreement for your part, what did you  
20 understand sexual assault to mean?

21 A Sexual assault was what was described to  
22 me by REDACTED when I met with her personally

1 on March 31.

2 Q What does it mean? Is it defined in the  
3 law somewhere?

4 A So she -- she described a sexual battery  
5 of Mr. Hunt touching her in sexual ways, pulling  
6 her pants down, touching her breast, turning her  
7 over and kissing her and pulling her shirt off of  
8 her shoulder and that she did not consent to that.  
9 So that is why I would describe that as sexual  
10 assault.

11 Q Now, is that defined in the law  
12 somewhere or is this just a definition that you  
13 use for your own purposes in reports like this?

14 MR. KLEIN: Objection. Calls for a legal  
15 conclusion. You can answer.

16 THE WITNESS: We did not base the  
17 definition on a particular jurisdiction's law, but  
18 that a sexual assault is a pretty general definition  
19 and those things that she described to us would fit  
20 that.

21 BY MR. MACGILL:

22 Q So you used no legal standard yourself

1 in approving the language sexual assault. There  
2 was no legal reference to that for your part.

3 A We did not reference anything legal in  
4 the report, no.

5 Q And you didn't -- I mean I'm just saying  
6 you agreed to the terms of this report -- when you  
7 agreed to the use of the phrase sexual assault,  
8 you didn't make any reference to any particular  
9 law?

10 A No, we did not.

11 Q You just used your common understanding  
12 of the term?

13 MR. KLEIN: Objection as to that question  
14 as to form. You can answer.

15 THE WITNESS: Yes. The common  
16 understanding, the things that REDACTED  
17 described to us, would fit a general definition of  
18 sexual assault.

19 BY MR. MACGILL:

20 Q Fit a general definition of a sexual  
21 assault. That's your testimony?

22 A Yes.

1 Q What definition would it meet?

2 A Well, I think if you were to talk to any  
3 prosecutor across the country that what she  
4 described to us would meet the definition of  
5 sexual assault. Now, it might be in different  
6 degrees, but that would be a definition of sexual  
7 assault.

8 Q Where would it be defined? Where would  
9 it be written? Where would this jury find a  
10 definition of the term "sexual assault"?

11 MR. KLEIN: Objection as to form. You can  
12 answer.

13 THE WITNESS: I mean, there's all kinds of  
14 places you can look for a definition of sexual  
15 assault.

16 BY MR. MACGILL:

17 Q Where did you -- what definition did you  
18 rely on, ma'am, in determining that it was  
19 appropriate, as you saw it, to include the word  
20 sexual assault?

21 A I relied on my understanding of sexual  
22 assault and what it --

1 Q Your understanding of sexual assault.

2 A Yes.

3 Q Where did you get the understanding?

4 Does your understanding have any reference in any  
5 legal standard?

6 MR. KLEIN: Objection. Compound question.  
7 You can answer.

8 THE WITNESS: We did not reference any  
9 legal standard.

10 BY MR. MACGILL:

11 Q You did not?

12 A I did not.

13 Q And Guidepost did not to your knowledge?

14 A I don't know what Guidepost did.

15 Q Now, you had -- there's a chief  
16 operating officer of this business, Mr. Collura  
17 right?

18 A Yes.

19 Q Did he sign off on this report?

20 A I don't know how to answer that.

21 Q Sexual assault requires -- for there to  
22 be a sexual assault there has to be a situation

1 where there was not consent, right?

2 A That's correct.

3 Q Okay. Now, I'd like you to tell us what  
4 evidence you had that perhaps there was consent by  
5 REDACTED to the encounter that evening?

6 MR. KLEIN: Objection as to form. You can  
7 answer.

8 THE WITNESS: Can you ask your question  
9 again?

10 BY MR. MACGILL:

11 Q Tell us what evidence you have that  
12 there was -- that indicated there may have been  
13 consent by REDACTED ?

14 MR. KLEIN: Objection as to form. You can  
15 answer.

16 BY MR. MACGILL:

17 Q To the events that occurred on that  
18 evening?

19 A And you are talking about July 25th, the  
20 evening in question is what you're talking about?

21 Q Yeah. 2010.

22 A Yes, yes. So I think the -- looking at

1 the totality of the things she talked to us about  
2 REDACTED provided us details that, you know, are  
3 details that some could argue may be represented  
4 or showed or could be used as evidence of consent.

5 Q What would those be?

6 A Potentially her inviting him over onto  
7 her balcony.

8 Q Anything else, ma'am?

9 A Potentially -- and these are things that  
10 someone else could use.

11 Q Understood.

12 A Continuing the conversation with him,  
13 having him come into the condo -- right now, those  
14 are the ones I can think of.

15 Q What about put being her necklace on his  
16 side of the couch as compared to her own side of  
17 the couch? Would that be consent in your mind?

18 MR. KLEIN: Objection as to form. You can  
19 answer.

20 THE WITNESS: No. I don't think so.

21 BY MR. MACGILL:

22 Q Tell the jury what you understand about

1     when she removed her necklace and where she placed  
2     the necklace?

3             MR. KLEIN:   Objection as to form.   You may  
4     answer.

5             THE WITNESS:   I recall her talking about  
6     taking off her necklace because it was bothering  
7     her.

8     BY MR. MACGILL:

9             Q     Right.

10            A     And she laid it on a table.

11            Q     Which table, ma'am?   Isn't that an  
12     important fact for you as an investigator to  
13     understand specifically which table she placed her  
14     necklace on?

15            A     I don't recall right this minute which  
16     table she put it on.   I'm happy to take a look at  
17     every notes and refresh my memory.

18            Q     Well, wait a minute.   You don't know  
19     those facts as to where they were sitting on the  
20     couch?   Were they sitting close to one other on  
21     the couch?

22            MR. KLEIN:   Objection.   Compound



1 questions.

2 BY MR. MACGILL:

3 Q That's fair. Break it down. Are you  
4 even able to tell this jury where they were seated  
5 on the couch, ma'am, on the night of this  
6 incident?

7 A Well, I think that they started off at  
8 separate places. She told us they started out in  
9 at separate locations on the couch.

10 BY MR. MACGILL:

11 Q Who was where?

12 A Well, she was on one side and he was on  
13 the other.

14 Q What side -- looking at the couch,  
15 ma'am, which side was she on?

16 A I can't tell you that today what side of  
17 the couch that she was on.

18 Q Let's see what else you know or don't  
19 know about really what happened. Okay? Was there  
20 an end table on each side of the couch?

21 A I do not have an independent  
22 recollection of that as I sit here today.

1           Q     Well, ma'am, you did an investigation.  
2     You referenced sexual abuse in a report that went  
3     to millions of people, and you can't tell this  
4     jury whether there were end tables on each side of  
5     the couch one way or another?

6           MR. KLEIN:  Objection.  Argumentative.  
7     You can answer.

8     BY MR. MACGILL:

9           Q     Now, let's talk about what else you  
10    don't know.

11          MR. KLEIN:  Objection.  Is that a question  
12    or is that a lead in to a proper question.

13    BY MR. MACGILL:

14          Q     It's a lead in to a proper question.  
15    It's also true that you don't know which end table  
16    she placed her necklace on, do you?

17          MR. KLEIN:  You can answer.  Objection as  
18    to form, but you can answer if you remember today.

19          THE WITNESS:  I don't remember.

20    BY MR. MACGILL:

21          Q     Ma'am, the evidence in this case is that  
22    she -- as you look at the couch is that she was

1     seated on left side of the couch. All right? I  
2     want you to assume that's true. And I want you to  
3     assume that's been documented in this case by the  
4     documentary evidence. Okay? Would you make that  
5     assumption?

6             MR. KLEIN: Objection. Calls for  
7     speculation and assumptions. You can ask this  
8     witness of her observations and memories and ask a  
9     proper question with regard to that.

10    BY MR. MACGILL:

11            Q     Okay. Let's just then deal with what  
12    you don't know. You don't know where she was  
13    seated on the couch, right?

14            MR. KLEIN: Objection.

15    BY MR. MACGILL:

16            Q     You don't know that.

17            MR. KLEIN: Objection. Mischaracterizes  
18    her testimony.

19            MR. MACGILL: I'm not with your  
20    objections. You need to be quiet now.

21            MR. KLEIN: I just want you to  
22    characterize --

1 BY MR. MACGILL:

2 Q You don't know --

3 MR. KLEIN: -- testimony properly, Rob, if  
4 you are going to refer to her question. That's all.

5 MR. MACGILL: Enough.

6 BY MR. MACGILL:

7 Q You don't know where she was seated on  
8 the couch, do you, ma'am.

9 A I know that she was seated on one side,  
10 and he was seated on the other.

11 Q You don't know whether she leaned over  
12 him to place her necklace on the end table next to  
13 him, do you?

14 A I don't recall that.

15 Q Now, wouldn't that be another fact that  
16 would be perhaps a detail or evidence potentially  
17 of consent?

18 A I don't believe that it would.

19 Q Well, ma'am, if you were seated next to  
20 a man on a couch and you leaned over that  
21 gentleman and placed a necklace that you had just  
22 taken off and leaned over him and put your

1 necklace on the end table next to him when you  
2 were seated on the opposite side of the couch,  
3 wouldn't that be indicative of some kind of  
4 conduct that might mean consent?

5 MR. KLEIN: Objection. Asked and  
6 answered.

7 THE WITNESS: I disagree.

8 BY MR. MACGILL:

9 Q You disagree. But you don't know what  
10 happened with respect to the necklace in any  
11 material respect, do you?

12 MR. KLEIN: Objection. Mischaracterizes.  
13 You can answer.

14 THE WITNESS: I don't recall all the  
15 details sitting here today about the necklace. I  
16 know she took it off, and she placed it on a table.

17 BY MR. MACGILL:

18 Q You will admit -- you've already  
19 admitted that she invited Johnny into her  
20 condominium, right?

21 A She told us that she asked him over onto  
22 her balcony.

1 Q Into her balcony or into her condo?

2 A Well, he -- she told us that he had to  
3 actually come through the front door to get to the  
4 balcony because it was not a cross-through  
5 balcony.

6 Q She consented to him coming into her  
7 condominium?

8 A She unlocked the door for him and let  
9 him come into her condominium.

10 Q She consented to him sliding closer on  
11 the couch, right?

12 A Yes. I believe she told us that she  
13 told him he could -- he could sit closer to her.

14 Q And you've already confirmed and  
15 admitted here that she consented to continuing  
16 conversation with him in her condominium, right?

17 A Yes.

18 Q You admit also that she told him, with  
19 respect to her allegation that he has sex three  
20 times a day, that she said I'll try to keep up.

21 Q You understand that occurred, right?

22 A She told us about that, yes.

1           Q     And the very next day -- the very next  
2     day after what you are claiming to be a sexual --  
3     let me use your words -- what you are claiming to  
4     be a "sexual assault," the very next day she asked  
5     to go on a run with him, right?

6           MR. KLEIN:  Objection.  Those are not her  
7     words; those are Guidepost's words.  But she can  
8     answer the question.

9     BY MR. MACGILL:

10          Q     Fair enough.  Let's restate to comply  
11     with counsel's objection.  So Guidepost put in the  
12     final report the words sexual assault, right?

13          A     Yes.

14          Q     And you agreed to the use of the words  
15     sexual assault in the report, final report, right?

16          MR. KLEIN:  Objection.  Asked and  
17     answered.  You can answer one more time.

18          THE WITNESS:  I didn't agree to the -- to  
19     anything about the final report, but I agree that  
20     what **REDACTED** described to us was sexual  
21     assault.

22

1 BY MR. MACGILL:

2 Q Do you agree that the word sexual  
3 assault never should have been used in the  
4 Guidepost report based on the investigation that  
5 you did?

6 A No.

7 Q So you agree -- you're okay with the  
8 word sexual assault in the final Guidepost report.

9 MR. KLEIN: Objection. I direct you not  
10 to answer that question. We've gone over it five  
11 times, Rob. I've asked you politely to move on now.

12 BY MR. MACGILL:

13 Q So ma'am, so you have no reason to  
14 disagree with the term sexual assault based on  
15 your testimony today, right?

16 MR. KLEIN: Objection. I'm directing you  
17 not to answer the question.

18 Rob, I'd ask you professionally to move  
19 on. I think you've established that she's given  
20 you answers to those questions.

21 BY MR. MACGILL:

22 Q The next day after the alleged sexual



1 assault, she in fact asked Pastor Johnny Hunt to  
2 go on a run with him, agreed?

3 A She told us that. I believe he somehow  
4 communicated to her that he was going on a run and  
5 she asked to go with him.

6 Q And you could agree that that could be  
7 evidence that might -- to repeat -- might be  
8 evidence of consent.

9 A That might be evidence that someone  
10 would use to argue that it's consent.

11 Q And did you read in her report that she  
12 French kissed him back at some point during this  
13 alleged sexual assault?

14 A Yes.

15 Q And would someone who French kissed the  
16 alleged assailant back, would that be potential  
17 evidence that might indicate consent?

18 A I think it would be potential evidence  
19 that might indicate consent, but it could also be  
20 evidence that there was not consent and that the  
21 person who was being assaulted was trying to get  
22 it over with quickly and hopefully things would

1 end sooner rather than later.

2 (KILPATRICK Exhibit Number 27 was marked  
3 for identification.)

4 BY MR. MACGILL:

5 Q I'm going to hand you Exhibit 27.

6 Ma'am, before we go to that, I want to review with  
7 you the details of potential arguments in favor of  
8 consent that you confirmed earlier. Fair enough?  
9 You listed a variety of evidence that could be  
10 potentially evidence of consent by REDACTED .

11 Do you remember that testimony?

12 A Yes.

13 Q And the jury has heard the testimony,  
14 and you listed, by my count, five different  
15 details of evidence or five different types of  
16 evidence that perhaps could be evidence of  
17 consent. But my question is, do you agree that an  
18 objective reader would want to know about this  
19 evidence of potential consent in understanding  
20 what happened between REDACTED on the one hand  
21 and Pastor Johnny Hunt in this incident?

22 A I'm not sure -- I'm not sure what a

1 reader -- I can't say what a reader is going to  
2 expect. What I can say is the things that we have  
3 talked about that are potential arguments for  
4 consent are things that we considered during our  
5 investigation, and there were other things that we  
6 also considered to determine that we felt like  
7 that REDACTED 's testimony to us was credible  
8 and that she was describing a nonconsensual  
9 assault.

10 Q Well, ma'am, your -- the Guidepost role  
11 was not to be judge and jury, was it? The  
12 engagement letter didn't tell you that you were to  
13 be judge and jury as to who was right and who was  
14 wrong in any sex abuse incident, right?

15 MR. KLEIN: Objection. Compound question.  
16 BY MR. MACGILL:

17 Q That's fair.

18 There's nowhere -- there's not one word in  
19 this engagement where you, the company -- you or the  
20 company were instructed to be judge and jury as to  
21 what happened in relation to any "sexual abuse"  
22 allegation, right?

1                   MR. KLEIN:  Objection as to form.  You can  
2                   answer.

3                   THE WITNESS:  We were not judge and jury.

4                   BY MR. MACGILL:

5                   Q       Well, ma'am, you were, because -- we can  
6                   read the words back to you, but you said you found  
7                   Dr. Hunt not to be credible, right?

8                   MR. KLEIN:  Objection.  Argumentative.

9                   BY MR. MACGILL:

10                  Q       That's what Guidepost said, right?  You  
11                  found Dr. Hunt not to be credible.

12                  A       That's correct.

13                  Q       Where in your engagement letter -- I'm  
14                  going to hand it to you -- where is it said that  
15                  you are to judge the credibility of witnesses.  
16                  Let's look together at the letter.  It's Exhibit  
17                  2.  I'm going to hand you back Exhibit 2, and  
18                  could you point out to us where it is that you are  
19                  to judge the credibility of people involved in  
20                  sexual abuse allegations?

21                  MR. KLEIN:  If you need to read the entire  
22                  document you can.  Read whatever part you are

1 comfortable with to answer the question.

2 BY MR. MACGILL:

3 Q And let me tell you, I'm going to focus  
4 you on section 3.1 where you were indicated, as  
5 directed by the SBC motion, Guidepost will  
6 investigate allegations of abuse by the Executive  
7 Committee members.

8 Do you see that?

9 A Yes.

10 Q And when you were involved with Pastor  
11 Johnny Hunt, that was a portion of the  
12 investigation that caused the analysis that you  
13 did pertaining to Pastor Johnny Hunt, right?

14 A That's correct.

15 Q And so the charge you had as a company  
16 was to investigate allegations of abuse. You  
17 weren't asked, were you, to be judge and jury  
18 about those allegations, were you?

19 A I was not asked to be judge and jury of  
20 anything.

21 Q Guidepost wasn't either, were they?

22 MR. KLEIN: Objection as to form. You can

1 answer.

2 THE WITNESS: Guidepost was asked to  
3 investigate allegations of abuse by Executive  
4 Committee members.

5 BY MR. MACGILL:

6 Q So I read here on page 161, the  
7 investigators did not find Dr. Hunt to be credible  
8 in their interviews with him, right? Part of the  
9 report?

10 A That's correct.

11 Q Where is it written anywhere that that  
12 was part of your job in this case to determine  
13 whether Dr. Hunt was credible in interviews.  
14 Where is that written, ma'am?

15 A It's not written explicitly in this  
16 letter of engagement.

17 Q So it's just gratuitous on your part to  
18 make mention of his credibility you felt you, as  
19 an investigator, had a license to make such a  
20 statement in a report that would go ultimately to  
21 millions of people?

22 MR. KLEIN: Objection. Argumentative and

1 compound, but you can answer.

2 THE WITNESS: Please restate your  
3 question.

4 BY MR. MACGILL:

5 Q So you -- you felt you had the right  
6 yourself, as an investigator, to be a sponsor of  
7 the sentence that investigators did not find  
8 Dr. Hunt to be credible in their interviews with  
9 him?

10 A As an investigator, we were  
11 investigating the facts, and we had to interview  
12 witnesses. And we were making determinations of  
13 credibility of those witnesses that we spoke with.

14 Q What authority did you have from  
15 anywhere, ma'am, to make assessments of  
16 credibility of witnesses. I have the engagement  
17 letter right here. There's no reference to your  
18 job being to assess credibility, is there?

19 MR. KLEIN: Objection. Compound  
20 questions. You can answer if you can.

21 THE WITNESS: Please repeat your question.  
22

1 BY MR. MACGILL:

2 Q There is no authorization anywhere in  
3 this engagement letter, Exhibit 2, for you as an  
4 investigator to judge the credibility of witnesses  
5 is there?

6 MR. KLEIN: Objection. Asked and answered  
7 but you can answer.

8 THE WITNESS: This letter of engagement  
9 engages Guidepost to do an investigation of  
10 allegations of being abused by an Executive  
11 Committee member. Part of an investigation is  
12 interviewing witnesses and evaluating credibility,  
13 and that's exactly what we did.

14 BY MR. MACGILL:

15 Q Want when did Pastor Johnny Hunt cease  
16 to be a representative of the Executive Committee?

17 A I don't know the answer to that.

18 Q Well, wait a minute, ma'am, you said  
19 that you've done it -- you made a report about  
20 Pastor Johnny Hunt and your investigatory period  
21 for Executive Committee period of members was  
22 what, ma'am?



1           A       I'm sorry. What did you say?

2           Q       What is the period of time of the  
3 investigation that you were to conduct? What  
4 years?

5           A       From 2000 to June of 2021.

6           Q       It's written right here in Exhibit 2,  
7 isn't it?

8           A       Yes.

9           Q       And what you were charged with was to  
10 investigate allegations of -- abuse allegations by  
11 Executive Committee member between January 1,  
12 2000, and January 14, 2021; is that correct?

13          A       Yes.

14          Q       Was Pastor Johnny Hunt a member of the  
15 Executive Committee during that period of time?

16          A       Johnny Hunt, I believe, was the  
17 president of the SBC. And in 2010 he became the  
18 immediately past president I believe in June of  
19 2010 of that year.

20          Q       When was the alleged assault.

21          A       July of 2010.

22          Q       Was the Pastor Johnny Hunt a member of

1 the Executive Committee during the alleged  
2 assault?

3 A I think that he was the immediate past  
4 president. He was not acting SBC president at the  
5 time.

6 Q So he what -- to repeat -- let me make  
7 sure we're crystal clear. Pastor Johnny Hunt was  
8 not a member of the Executive Committee on  
9 July 28, 2010, agreed?

10 A I do not think that he was.

11 Q You do not think that he was. Well,  
12 wait a minute, ma'am. You written a report that  
13 has a specific time frame in it. And are you  
14 telling this jury and this judge that you don't --  
15 that are admitting that he was not a member of the  
16 Executive Committee at the time of the alleged  
17 assault?

18 MR. KLEIN: Objection. Asked and  
19 answered. Now just asked in a different way. Same  
20 question. You can answer if you can.

21 THE WITNESS: He was not a member of the  
22 Executive Committee in July of 2010.

1 BY MR. MACGILL:

2 Q All right. And you knew that at the  
3 time that you did your investigation?

4 A Yes.

5 Q So let's talk about what you did and  
6 whether it was authorized by the metes and bounds,  
7 so to speak, of the engagement letter. Let's look  
8 at the engagement letter together. Look at the  
9 bullet point number two.

10 Bullet point number two says: Mishandling  
11 of abuse allegations by Executive Committee members  
12 between January 1, 2020, and June 14th 2021. Do you  
13 see that?

14 A Yes.

15 Q Who was it -- with respect to the  
16 mishandling component of this, who at the SBC  
17 mishandled incident associated with Johnny Hunt?

18 MR. KLEIN: Objection as to form. No  
19 foundation. But you can answer.

20 THE WITNESS: I don't believe that that  
21 was a situation because it was unknown. His  
22 situation was unknown to the Executive Committee.

1 BY MR. MACGILL:

2 Q So at the time you authored -- strike  
3 that.

4 At the time that you did your  
5 investigation, you understood at all times that as  
6 far as the alleged assault committed, that Pastor  
7 Johnny Hunt was not in the Executive Committee at  
8 the time of the alleged sexual assault?

9 MR. KLEIN: Objection. Asked and  
10 answered. You can answer.

11 THE WITNESS: Johnny -- Mr. Hunt was not a  
12 member of the Executive Committee in July of 2010.  
13 However, there was an ongoing relationship over the  
14 years between the REDACTED and Mr. Hunt where REDACTED  
15 REDACTED shared with us several time frames when she  
16 was made to feel uncomfortable by the attention that  
17 Mr. Hunt showed her. So he was in the capacity of  
18 Southern Baptist Convention president when some of  
19 these things took place.

20 BY MR. MACGILL:

21 Q Back to Exhibit 27. Is this REDACTED  
22 REDACTED

1           A       It's                   REDACTED

2                   REDACTED

3                   MR. KLEIN:   Rob, I would just say, before  
4           you get into any specifics of the document, it is  
5           designated as attorney eyes only. We don't have to  
6           have our back and forth about our positions on that.  
7           That's already on the record, but I would ask if you  
8           are going to read from it -- and also  
9           Ms. Kilpatrick, if you are going to read from it --  
10          that we do that outside the presence of Mr. Hunt.

11       BY MR. MACGILL:

12           Q       Did you understand, ma'am, that --  
13          specifically that the REDACTED wanted the Southern  
14          -- wanted the SBC to compensate them?

15                  MR. KLEIN:   Again, without referring to  
16          the document, you can certainly answer that question  
17          if you can.

18                  THE WITNESS:   Please ask your question  
19          again.

20       BY MR. MACGILL:

21           Q       Did you understand that the REDACTED in  
22           REDACTED           -- strike that.

1 Did you understand that as of REDACTED

2 REDACTED

3 REDACTED

4 A REDACTED

5 REDACTED So no.

6 Q Did the REDACTED

7 REDACTED

8 MR. KLEIN: Again, Ms. Kilpatrick, I ask  
9 you if you can -- very simple. If you can answer it  
10 without reading from the document, based on your own  
11 memory, then you are free to answer. If you are  
12 unable to from your own memory answer that question,  
13 then just advise Mr. MacGill, and he'll either ask a  
14 different question or we'll separate Mr. Hunt out.  
15 So just however you can answer in that capacity you  
16 can do so.

17 THE WITNESS: I do recall the  
18 REDACTED shared, and I took  
19 the recommendations to mean, as we ask every  
20 survivor that we talk to in this investigation, we  
21 ask for general recommendations for the SBC for us  
22 to consider in our report. I took the

1                   REDACTED                   conveyed to us as those  
2   being general recommendations to survivors of abuse  
3   in general.

4   BY MR. MACGILL:

5           Q       Did                   REDACTED

6                                   REDACTED

7                                   REDACTED

8   REDACTED

9           A       I don't recall whether   REDACTED

10                                   REDACTED

11                   REDACTED

12                                   (KILPATRICK Exhibit Number 28 was marked  
13                                   for identification.)

14   BY MR. MACGILL:

15           Q       I'm going to hand you Exhibit 28. Did  
16   you see this document -- strike that.

17                   Is exhibit 28           REDACTED

18   REDACTED

19           A       Yes, it is.

20           Q       And was this           REDACTED

21                                   REDACTED

22   REDACTED

1 A Yes. REDACTED

2 REDACTED

3 Q And this was REDACTED

4 REDACTED

5 A That's correct.

6 Q And this is REDACTED prior to the  
7 publication of the Guidepost report?

8 A Roughly. I mean, REDACTED yes.

9 Q So when you received this on REDACTED  
10 you understand that there was financial motivation  
11 in Mr. REDACTED in terms of collecting  
12 information -- I'm sorry -- REDACTED  
13 Pastor Johnny Hunt?

14 MR. KLEIN: Before you answer that,  
15 Ms. Kilpatrick -- Rob, again, this is an attorney's  
16 eyes only document. I just want to make sure  
17 neither you nor Ms. Kilpatrick are reading or  
18 quoting from it. You, of course, can ask general  
19 questions about refreshing her memory about it. I  
20 would ask that if you want to have her get more  
21 specific that you do so with Mr. Hunt in a breakout  
22 room.



1           MR. MACGILL: Yeah. Well, we're going to  
2 come back. Let's get the court ruling, then we'll  
3 redepose the witness on these topics. But let me do  
4 what I can --

5           MR. KLEIN: That is not going to happen,  
6 Rob.

7           MR. MACGILL: It's going to happen.

8           MR. KLEIN: You had your -- let me just  
9 say one thing on the record then, Rob. You had your  
10 opportunity, Rob. There's a mechanism in the  
11 protective order that explains how to challenge  
12 designations. You have exercised that right. You  
13 had that opportunity then to wait to depose these  
14 witnesses until that motion was decided of your own  
15 choosing, which is certainly your prerogative. You  
16 chose to go forward with them now. And if you now  
17 have to live with that decision. All I'm saying is  
18 we have an ability, as we did yesterday and earlier  
19 today, to question this witness sufficiently and  
20 adequately with this information with your client  
21 not present. And if in fact your motion is granted,  
22 your client will not be prejudiced at all because he

1 will then be able to read the exact transcript and  
2 be shown those documents. So he will not be  
3 prejudiced if in fact the ruling is in your favor.  
4 You have this witness now. You can ask her  
5 questions about this document now. All we are  
6 asking and we agreed yesterday and earlier today is  
7 that you, for the moment, move Mr. Hunt to a Zoom  
8 private room so you can ask this witness anything  
9 you want and nothing will be prejudiced if you are  
10 successful in the motion.

11 MR. MACGILL: Disagree. Now, what you all  
12 have done -- and we'll make a record of this -- you  
13 have been unfair with us in your production of  
14 documents. You produced 10,000 pages a week ago.  
15 You should have produced those documents last year.  
16 You refused to produce documents for months upon  
17 months. We've been prejudiced by that. You  
18 designated AEO materials without any basis in the  
19 law, and the court will so rule we hope. Right?

20 You are making claims of attorney's eyes  
21 only on documents that have nothing to do with the  
22 designation itself. It's prejudiced our ability

1 to talk to our client during the deposition  
2 proceedings, and we're not going to have it  
3 anymore.

4 We're going to ask the court to  
5 resume -- once we get the ruling -- to bring both  
6 witnesses back. And if we have to bring the CEO,  
7 Julie Wood, back, we're going to do that too. But  
8 we're not putting up with this anymore. We have  
9 the right to consult with our client live during  
10 the deposition itself about these documents.  
11 You've prevented that. We're not going to allow  
12 it. The judge will tell us what's allowed.

13 With respect to documents that have been  
14 destroyed, you've never answered our question of  
15 who destroyed what when. You've refused to answer  
16 the question. We've asked you repeatedly, and now  
17 we've asked for a court order to have you confirm  
18 who destroyed what when. All right?

19 So we can all make our arguments. I'm  
20 just putting you on notice that we intend to come  
21 back, okay? And that's -- we're going to bring the  
22 witness yesterday back, and we're going to bring

1 this witness back if the court rules in our favor.  
2 If we lose that's it.

3 MR. KLEIN: Okay. Well, I will just  
4 disagree with that. And we will, of course, oppose  
5 such application. I'm just putting a record now  
6 that you are not being prejudiced by asking this  
7 witness any questions you want about these documents  
8 just outside the presence of Mr. Hunt for now. And  
9 I think our record is made, Rob.

10 MR. MACGILL: It's clear. You provided  
11 our ability to consult with our client on important  
12 documents in the case and on this one as well, and  
13 we deal with -- the court will make a ruling.

14 BY MR. MACGILL:

15 Q Now, ma'am, this is -- you've heard the  
16 exchange with counsel. Your counsel is refusing  
17 to allow Pastor Johnny Hunt to hear the content of  
18 Exhibit 28. You understand that, right?

19 A Yes.

20 Q And it's not your decision. That's  
21 Guidepost and its counsel making that decision,  
22 right? That's not your decision.

1           MR. KLEIN:  Objection as to that.  I told  
2   you, Rob, that that's our decision as counsel.  I'm  
3   not going to reveal those communications.  But yes,  
4   you can take me that it's our decision to do this.

5   BY MR. MACGILL:

6           Q     When you saw on     REDACTED     Exhibit  
7   28, you understood that     REDACTED     is a  
8   gentleman who wanted to     REDACTED  
9         REDACTED     right?

10           MR. KLEIN:  I'm going to ask you, though,  
11   the same admonition earlier.  If you can answer  
12   that -- you can use the document to refresh your  
13   memory.  If it refreshes your memory, you, of  
14   course, can and must answer Mr. MacGill's question.  
15   It is doesn't, just let us know that.  And then  
16   we'll go from there.

17           THE WITNESS:  Please ask your question  
18   again.

19   BY MR. MACGILL:

20           Q     You understood when you received Exhibit  
21   28 on     REDACTED     that     REDACTED     wanted     REDACTED  
22         REDACTED

1           A       I recall receiving these emails and  
2       recall that they mentioned       REDACTED  
3       REDACTED among other things. I remember reading  
4       about                               REDACTED  
5                               REDACTED

6                       REDACTED  
7                       But my understanding also of these  
8       documents is that these documents were never -- like  
9       they were dated prior to us speaking with the  
10      REDACTED and I have no information that they were  
11      ever sent to Mr. Hunt.

12           Q       Okay. But you knew, just as any citizen  
13      walking down the street would know that on  
14                       REDACTED                       and he had  
15                       REDACTED                       right?

16           A       I think that's a part of       REDACTED  
17      yes.

18           Q       You understood that he       REDACTED  
19                       REDACTED                       Right?

20           A       I do not recall that piece sitting here  
21      right now.

22           Q       Well, don't you -- didn't you have the

1 understanding that there was a request that --  
2 well, let me ask it this way: Didn't you  
3 understand that his REDACTED  
4 REDACTED those  
5 kinds of things?

6 Didn't you understand that?

7 A I do recall him talking about his  
8 REDACTED

9 Q He REDACTED too,  
10 as you understood it on REDACTED right?

11 A Yes. But I don't know REDACTED -- I  
12 don't know REDACTED

13 Q Yes, you do. You read it with your own  
14 eyes. He had told you -- you read in this  
15 document, Exhibit 28, what REDACTED  
16 You saw that, ma'am. Right?

17 MR. KLEIN: Objection. Compound  
18 questions. You can answer if you can.

19 BY MR. MACGILL:

20 Q You saw with your own eyes his REDACTED  
21 REDACTED in Exhibit 28, right?

22 A I saw the document, and right now

1 sitting here, I can't recall what it is. I'll  
2 take a look.

3 Q All right. Let's take a look at page  
4 554.

5 MR. KLEIN: Again, we cannot speak to this  
6 document specifically with Mr. Hunt -- Dr. Hunt  
7 present. So Mr. McGill, I would ask if you want to  
8 reference it specifically, then we have a breakout  
9 room for Dr. Hunt.

10 MR. MACGILL: Look at page 554.

11 MR. KLEIN: Rob, are you going -- I just  
12 want to know if you are going to ignore my request.

13 MR. MACGILL: No, I'm not. That's why  
14 we're coming back. No. I'm not going to ignore  
15 your request.

16 MR. KLEIN: That's fine. I disagree with  
17 the coming back part but I respect your saying  
18 you're not going to read from it. That's fine.  
19 Thank you.

20 MR. MACGILL: We're coming back as far as  
21 I'm concerned.  
22



1 BY MR. MACGILL:

2 Q Now, ma'am, do not ref -- we're going to  
3 follow the demands of the counsel. Okay? He's  
4 demanding that we not speak the words on the  
5 record. You understand that.

6 A Yes.

7 Q You should not in answering my questions  
8 speak the words that are contained in this  
9 document. Okay?

10 A Okay.

11 Q Now, with that in mind, you understood  
12 and you had read with your own eyes REDACTED

13 REDACTED

14 REDACTED right?

15 A Yes. I had read this document. Sitting  
16 here today, I did not have an independent  
17 recollection of REDACTED that was listed in this  
18 document.

19 Q Now, without mentioning the content of  
20 the document, it was REDACTED

21 REDACTED

22 REDACTED as you understood it.

1 MR. KLEIN: Objection. Asked and  
2 answered. She said she didn't recall.

3 BY MR. MACGILL:

4 Q She recalls now. She's just read it.  
5 You just read to refresh your recollection as to  
6 the REDACTED wrote on Bates  
7 number 554, Exhibit 28. Right?

8 MR. KLEIN: I don't know -- are you going  
9 to ask -- I'm not sure it's refreshed her memory,  
10 Rob. You certainly can ask her if it's refreshed  
11 her memory.

12 THE WITNESS: It is not -- I don't recall.  
13 I mean I don't recall REDACTED of my  
14 independent recollection. I did read these emails.

15 BY MR. MACGILL:

16 Q Great. Let's read it together. Not out  
17 loud. Please read paragraph number two on the  
18 bottom of page 554. Do not read it aloud, but  
19 read it to yourself.

20 A I can read.

21 Q Now, you've read a reference by  
22 REDACTED right?

1           A       I have.

2           Q       Does this refresh your memory that on  
3 April 1st, 2022, you knew that Mr. REDACTED was  
4 interested in                   REDACTED  
5 REDACTED from Pastor Johnny Hunt?

6           A       It refreshes my recollection as to Mr.  
7                   REDACTED

8           Q       Now, as a lawyer, you were admitted to  
9 the bar in 1990, right.

10          A       Yes.

11          Q       As a lawyer, you could look at the  
12 information on this, 554, and see that when  
13 somebody makes a reference to       REDACTED       that  
14 that has a meaning in the law, right?

15          A       Yes.

16          Q       And if you've           REDACTED  
17 REDACTED that you could be -- if there was a legal  
18 right, you could be           REDACTED  
19                   REDACTED                   right?

20               MR. KLEIN:  Objection.  Calls for a legal  
21 conclusion.  You can answer if you can.

22               THE WITNESS:  I can't make that legal

1 conclusion. I see the REDACTED that are written on  
2 this document, and that's what's here. And I can't  
3 read it, but that's what here.

4 BY MR. MACGILL:

5 Q Of course, it is. Now, you as a lawyer  
6 understand that if somebody says that I've REDACTED  
7 REDACTED as a matter  
8 of just an approach in court, then that person  
9 would come to the court and say I want REDACTED  
10 REDACTED right?

11 MR. KLEIN: Objection. Calls for a legal  
12 conclusion. You can answer.

13 THE WITNESS: I can't give you a legal  
14 conclusion. And I can't read what's on this -- this  
15 -- this paper. I mean, I think that -- I cannot say  
16 what these REDACTED are, but I do not agree with what  
17 you're saying.

18 BY MR. MACGILL:

19 Q But you know -- okay. Well, let's just  
20 make sure -- let's see if we can do two things.  
21 You knew that REDACTED -- you knew it as of  
22 REDACTED that REDACTED wanted a

1                   REDACTED                   from Pastor Johnny

2       Hunt.

3                   MR. KLEIN:   Objection asked and answered.

4       You can answer.

5                   THE WITNESS:   He wanted REDACTED from Johnny

6       Hunt.

7       BY MR. MACGILL:

8           Q       Okay.   Now let's talk about math.   Let's  
9       do some math together.   I want you to assume --

10      don't read the document -- I want you to assume

11      that Mr. REDACTED told you on       REDACTED       that

12      he had       REDACTED       and that that

13                   REDACTED                   he'd

14      had a       REDACTED       Right?

15                   I want to make those two assumptions.   If

16      the conduct by Pastor Johnny Hunt were found to be

17      wrongful, the       REDACTED       of the claim

18      would be REDACTED on my assumptions, wouldn't it?

19                   MR. KLEIN:   Objection.   Calls for

20      speculation.   Calls for a legal conclusion.   You can

21      answer.

22                   THE WITNESS:   First off, Mr. REDACTED didn't

1 say what you just said to me. And so I -- he  
2 didn't -- he didn't tell me over a period of time  
3 and document it all out. He just gives these  
4 REDACTED and I can't read to you what it says. He  
5 is requesting -- he is -- he is talking about REDACTED  
6 REDACTED and you are trying to get me to say that  
7 it's significant. And what's on this document is  
8 not significant. I'm not going to say it's  
9 significant.

10 BY MR. MACGILL:

11 Q You say it's not significant?

12 A Well, when you look at other situations  
13 in cases involving reporters of sexual abuse,  
14 that's not a significant REDACTED

15 Q Okay. Now, Pastor Johnny Hunt, I know  
16 you are on the line, I would like to speak to you  
17 about these circumstances, but what I'd like to do  
18 now, you need to see the content of this letter in  
19 order for us to do our job here today. We're not  
20 able to do it without speaking to you about what  
21 is in this letter directed to you, this draft  
22 letter, but I'm going to proceed by asking you now

1 to leave the meeting, and I'm going to ask this  
2 witness now some questions even though I don't  
3 have the ability to speak with you about it.  
4 We'll ask the court to authorized this witness to  
5 return once they have the opportunity to get your  
6 counsel and guidance on the meaning and effect of  
7 this document.

8 MR. KLEIN: We're going to object to that,  
9 if that application is made. I appreciate you  
10 letting Dr. Hunt leave the video room.

11 Warren, if you can assist in having  
12 Johnny Hunt.

13 VIDEOGRAPHER: I'll give it a try again.  
14 BY MR. MACGILL:

15 Q So ma'am, I've made my record about  
16 this, but I want to now talk about what you knew  
17 on REDACTED You had a REDACTED from  
18 REDACTED , did you not?

19 A Yes.

20 Q And we'll put in front of the jury what  
21 your counsel has refused Dr. Hunt to see, but I'm  
22 going to do this for now, and we're going to come

1 back if the court allows. Turn to 544.

2 A I'm there.

3 Q The REDACTED from REDACTED , your  
4 witness in your investigation, ma'am, that you met  
5 with not one time but perhaps as many as nine  
6 times informs you that he wants -- he's demanding  
7 from Dr. Hunt a REDACTED .

8 Do you see that?

9 A I see where Mr. REDACTED is saying he  
10 would REDACTED , and  
11 he lists REDACTED under that.

12 Q Well, let's not use your  
13 characterization. Let's look at the words, the  
14 actual words that you were provided at the time  
15 that you were conducting your work as a lead  
16 investigator. Your star witness, ma'am, the  
17 witness that you relied on from the beginning to  
18 the end of your work says the following on page  
19 554: REDACTED

20 REDACTED

21 REDACTED

22 REDACTED



1 Do you see that?

2 MR. KLEIN: Objection as to form. But you  
3 can answer the question.

4 THE WITNESS: Yes.

5 BY MR. MACGILL:

6 Q And that he has also claimed on the next  
7 page that he, Johnny Hunt, has caused him to REDACTED

8 REDACTED . Do you see that?

9 A I do.

10 Q Now, how many REDACTED do  
11 you read that as a lawyer practicing for decades?

12 A So I would apologize. You were  
13 referencing me to the Bates number 14554, and I  
14 did not see the REDACTED listed  
15 in his list.

16 Q So the REDACTED -- let's just do some doe  
17 math together, ma'am, now that we're looking with  
18 our own eyes and not tethered by what these  
19 lawyers are doing to us. I want to just focus on  
20 what the reality is in terms of what you knew on

21 REDACTED Your star witness, ma'am, REDACTED  
22 wanted a REDACTED He

1       wanted       REDACTED       , didn't he?

2               MR. KLEIN:   Objection as to form.   Lack of  
3       personal knowledge.   You can answer.

4               THE WITNESS:   I can only testify and talk  
5       about what is in this letter.   And so he says that

6               REDACTED

7               REDACTED

8               REDACTED

9               REDACTED       That's what I know from this  
10       letter.   But I will also tell you that our witness  
11       that you are talking about was not   REDACTED   .   It  
12       was   REDACTED   .

13       BY MR. MACGILL:

14           Q       Now -- we'll get to that, ma'am.   But  
15       let's just do some math so the jury knows what you  
16       knew at the time.   What you know is, if you just  
17       did simple math on the   REDACTED   of his  
18       claim, the unvarnished truth of this is he was  
19       asking for   REDACTED   in  
20       this   REDACTED   wasn't he?

21               MR. KLEIN:   Objection as to form.   Calls  
22       for a speculation.   Lack of personal knowledge.   You

1 can answer.

2 THE WITNESS: I can only tell you what the  
3 REDACTED states that he was asking for. He didn't  
4 give a REDACTED I mean you can multiply it  
5 out. It's a REDACTED

6 BY MR. MACGILL:

7 Q Let's do the math together. He was  
8 asking for a REDACTED ; is that  
9 right?

10 MR. KLEIN: Objection as to form. You can  
11 answer.

12 BY MR. MACGILL:

13 Q Is that right?

14 A A REDACTED

15 REDACTED .

16 Q All right. Now, how many years?

17 REDACTED ?

18 A I mean if you are talking REDACTED

19 REDACTED .

20 Q Yeah.

21 A Yes.

22 Q So let's just do the math together while

1 we're here together this afternoon. REDACTED

2 REDACTED , isn't it?

3 A I agree with your math.

4 Q Okay. now, on the REDACTED of his  
5 claim, you knew on REDACTED that your witness, your  
6 star witness, ma'am, in this matter, REDACTED ,  
7 was asking for, at least on the REDACTED of  
8 his potential claim for REDACTED , right?

9 MR. KLEIN: Mischaracterizes her  
10 testimony, but she can answer.

11 THE WITNESS: So to start with, REDACTED  
12 REDACTED was not our star witness. REDACTED was  
13 our star witness. And the answer to your math  
14 question is, yes, I knew that he had REDACTED and he  
15 was asking Mr. Hunt to REDACTED

16 BY MR. MACGILL:

17 Q But it wasn't just REDACTED , he also  
18 wanted REDACTED on top of that, right?

19 MR. KLEIN: Objection as to form. You can  
20 answer.

21 THE WITNESS:  
22

1 BY MR. MACGILL:

2 Q In this REDACTED

3 A In this REDACTED I'm aware of --  
4 that he mentions a REDACTED and a  
5 REDACTED .

6 Q And in this draft letter that you saw  
7 with your own eyes on REDACTED you now know that  
8 he is asking for in these two elements alone,  
9 REDACTED . Is that right?

10 A The math would be correct, and that's  
11 what's in this REDACTED that he gave us that I have  
12 no information that it was ever asked for. But  
13 that's what's in this REDACTED

14 Q Okay. Now, we don't want to short  
15 Mr. REDACTED on what he was planning to do at the  
16 time that he informed you about his intentions on  
17 REDACTED His REDACTED could have been  
18 more than REDACTED, right?

19 MR. KLEIN: Objection. Calls for  
20 speculation. You can answer.

21 THE WITNESS: It's possible.  
22

1 BY MR. MACGILL:

2 Q Yeah. Because it would be -- his REDACTED  
3 REDACTED could extend beyond 2022, right?

4 MR. KLEIN: Objection. Same objection.  
5 You can answer.

6 THE WITNESS: It's possible.

7 BY MR. MACGILL:

8 Q Right. And so you knew on REDACTED  
9 having read this with your own eyes as a lawyer  
10 who's practiced law for decades, as a sole  
11 proprietor and otherwise, that this gentleman,  
12 your star witness, ma'am, is a person who could  
13 have a demand for perhaps REDACTED  
14 REDACTED right?

15 MR. KLEIN: Objection. Intentionally  
16 Mischaracterizing the testimony, but you can answer.

17 THE WITNESS: So again, Mr. REDACTED is not  
18 my star witness. REDACTED is the significant  
19 main witness in this matter. And yes, we were aware  
20 by these REDACTED that Mr. REDACTED  
21 was REDACTED  
22

1 BY MR. MACGILL:

2 Q Okay. Now, so did you make -- I just  
3 want to know -- and I think this jury is entitled  
4 to know, did you make reference to Exhibit 28 in  
5 the Guidepost report?

6 A No, I don't believe we did.

7 Q Now, ma'am, to be fair and to be  
8 independent as an investigator, didn't you feel an  
9 obligation as a citizen, not to mention as a lead  
10 investigator, to make sure that the details of  
11 Exhibit 28 were found to the text of your report  
12 and included in the text of your report?

13 A No, I did not.

14 Q You said that Johnny Hunt was not  
15 credible, ma'am. Do you remember those words?  
16 That's what Guidepost said in the report?

17 A Yes.

18 Q Do you think this gentleman, Mr. REDACTED ,  
19 is credible when he's sharing with you a document  
20 that says that he may demand REDACTED  
21 from Pastor Johnny Hunt. Do you think he's  
22 credible in those circumstances?

1           A       I think that the story and the -- the  
2       testimony we received about REDACTED about her  
3       encounter with Mr. Hunt was credible.

4           Q       Now, let's talk about the star witness.  
5       I've used the term star witness, REDACTED , and  
6       you don't like it when I do that, right? You  
7       don't think that's fair for me to use star witness  
8       in connection with REDACTED ?

9           A       I just disagree.

10          Q       Okay. That's fine. Let's agree to  
11       disagree. Let me ask you about his role as a  
12       witness then. Let's not use an adjective. Okay?  
13       I won't use an adjective in my question.

14                 REDACTED is the person who first  
15       reached out to Guidepost; is that correct?

16          A       I believe that that's correct, but he  
17       did not reach out to me.

18          Q       The majority of the communications with  
19       Guidepost were from REDACTED , were they not?

20          A       I don't know that I could calculate  
21       that. The majority of my interactions were with  
22       REDACTED .



1           Q     The volume of materials -- the volume of  
2     written materials -- we have them right here. We  
3     could go through the pages if you like, but the  
4     volume, the majority of the pages written to  
5     Guidepost came from REDACTED , right?

6           MR. KLEIN:  Objection as to form.  You can  
7     answer.

8           THE WITNESS:  Yes.

9     BY MR. MACGILL:

10          Q     Now, with respect to the REDACTED  
11     report -- this is Exhibit 7, right?  You  
12     understood that this had been generated -- this  
13     had been prepared by REDACTED as well as his  
14     wife?

15          A     I believe that's correct.

16          Q     What was the role of REDACTED in  
17     this document.  Was he the author primarily?

18          MR. KLEIN:  Objection as to form.  You can  
19     answer.

20          THE WITNESS:  My understanding was that  
21     they prepared the document together.

22

1 BY MR. MACGILL:

2 Q This is what you referred to as REDACTED  
3 REDACTED isn't it?

4 MR. KLEIN: Objection. You can answer if  
5 you know.

6 BY MR. MACGILL:

7 Q Let me ask a better question. This  
8 document, Exhibit 7, is REDACTED  
9 isn't it?

10 A I think that parts of Exhibit 7 towards  
11 the back of Exhibit 7 where he -- where he, I  
12 believe starts REDACTED is potentially  
13 REDACTED But I believe there was another REDACTED  
14 that was provided to us in electronic form.

15 Q Now, ma'am, I've looked through the  
16 report from beginning to end, and I have not seen  
17 any reference that Guidepost had the interest in  
18 making this report have REDACTED Do you agree  
19 that you didn't make reference to that interest of  
20 Guidepost wanting this report to have REDACTED?

21 MR. KLEIN: Objection as to form. You can  
22 answer.

1 THE WITNESS: Can you ask the question  
2 again. I'm not sure what you're asking.

3 BY MR. MACGILL:

4 Q Did Guidepost disclose that one of the  
5 lead investigators in this report wanted it to  
6 have REDACTED?

7 MR. KLEIN: Objection. Asked and answered  
8 you can answer.

9 THE WITNESS: No.

10 BY MR. MACGILL:

11 Q Why not?

12 A I'm not sure what you are asking me.

13 Q Well, ma'am, you -- you are talk -- you  
14 talked from the beginning of this deposition ask  
15 throughout that this was an independent report,  
16 right?

17 A Yes.

18 Q But you have your co-lead investigator  
19 saying to you that the draft that he had seen did  
20 not have REDACTED Do you remember that?

21 MR. KLEIN: Objection. Asked and  
22 answered. We went over this this morning. But you

1 can answer again.

2 BY MR. MACGILL:

3 Q Why didn't you disclose in the written  
4 materials at Guidepost that in fact one of the  
5 lead investigators wanted this report to have  
6 REDACTED?

7 MR. KLEIN: Objection as to form. You can  
8 answer.

9 THE WITNESS: I'm still unsure what you  
10 are actually asking me.

11 BY MR. MACGILL:

12 Q You talked about credibility being  
13 important?

14 A Yes.

15 Q Guidepost credibility was important in  
16 terms of this report also, right?

17 A Yes.

18 Q Is Guidepost independent if it's wanting  
19 its report to have REDACTED?

20 A I think it depends on how you define  
21 REDACTED.

22 Q How did your co-lead investigator define

1 REDACTED to your knowledge?

2 MR. KLEIN: Objection.

3 THE WITNESS: I don't know.

4 MR. KLEIN: I'm sorry. Let me just  
5 object. You said you don't know. The answer will  
6 stand. My apologies.

7 (KILPATRICK Exhibit Number 29 was marked  
8 for identification.)

9 BY MR. MACGILL:

10 Q I'm going to hand you Exhibit 29. Now,  
11 ma'am, I just want to identify this document,  
12 Exhibit 29, is this a REDACTED

13 REDACTED

14 A Yes.

15 Q And is the REDACTED

16 A Only the REDACTED which I  
17 think you're referring to, is REDACTED

18 REDACTED

19 Q Okay. Mr. Holske, it's his beginning

20 REDACTED

21 A Yes.

22 Q That's his REDACTED And then you REDACTED

1 REDACTED

2 A Yes.

3 Q And this was REDACTED is  
4 that right?

5 A Yes.

6 Q And this would have been -- this would  
7 have been REDACTED you interviewed Pastor  
8 Johnny Hunt.

9 A Yes.

10 Q And you're learning that REDACTED  
11 REDACTED Right?

12 Yes?

13 A Yes.

14 Q And then you REDACTED did you not?

15 A I did.

16 Q You said REDACTED  
17 REDACTED

18 REDACTED

19 REDACTED

20 Are those your words?

21 A Yes.

22 Q Are those words to you do you think

1 fairly placed in context to be that of an  
2 independent investigator?

3 A I don't think that they speak to  
4 independence or nonindependence.

5 MR. MACGILL: Let's go ahead and take a  
6 break.

7 VIDEOGRAPHER: We're going off the record  
8 at 2:54 p.m.

9 (Whereupon, a brief recess was taken.)

10 VIDEOGRAPHER: We're now back on the  
11 recorded at 3:15 p.m. You may proceed.

12 BY MR. MACGILL:

13 Q I want to focus for a few more minutes  
14 on the role of REDACTED in your investigation.  
15 So REDACTED , we've reviewed the REDACTED  
16 REDACTED document that he was a part of. Do you  
17 remember that?

18 A Yes.

19 Q That was Exhibit 7; is that right?

20 A Yes.

21 Q Okay. Now, in addition to that your  
22 report also -- the Guidepost report also cites

1 that there was witness one, two, and three that  
2 validated or corroborated what REDACTED or  
3 REDACTED said, right?

4 A Yes.

5 Q Now, witness one and witness two were  
6 unnamed pastors; is that right?

7 A Yes.

8 Q And witness three, was that a pastor  
9 also?

10 A I believe he had some sort of pastoral  
11 type of job.

12 Q Not a pastor himself?

13 A I think he had been a pastor maybe.

14 Q Okay. Fair enough. So three pastors  
15 were the independent witnesses who validated REDACTED  
16 REDACTED and REDACTED had to say in your view as  
17 a lead investigator; is that right?

18 A Well, in addition -- yes. But in  
19 addition I would say that Mr. Blankenship also did  
20 the same thing and to a certain extent Mr. Hunt in  
21 his second interview corroborated some details.

22 Q You didn't call them corroborating



1 witnesses, did you?

2 A The three that you are talking about?

3 Q No. Did Roy Blankenship -- did you  
4 indicate that he validated the report of the  
5 REDACTED in the report? Do you recall?

6 A I don't think we used those words, but  
7 we used his testimony or his interview with us to  
8 display those facts that were similar to what the  
9 REDACTED had shared.

10 Q All right. But I want to focus now on  
11 the role of REDACTED and the words that he  
12 spoke to different people?

13 A Okay.

14 Q REDACTED had a conversation with  
15 witness one in the year 2010; is that right?

16 MR. KLEIN: Objection as to form. You can  
17 answer.

18 THE WITNESS: Yes. I believe that's  
19 correct. And I may need to confirm one, two, and  
20 three, the names, to kind of keep it straight.

21 MR. MACGILL: Okay.

22 MR. KLEIN: But the names cannot be

1 revealed publicly.

2 THE WITNESS: Right. Correct.

3 MR. KLEIN: So if you need to reveal the  
4 names or if documents can refresh your memory  
5 without revealing the names --

6 BY MR. MACGILL:

7 Q Would the report help you, to see the  
8 report and the references to witness one, two, and  
9 three?

10 A Yes.

11 Q All right. I'm going to hand you -- why  
12 don't you hand me back the exhibits you have and  
13 I'm going to hand you back the report.

14 All right. I'm going to turn exhibit --  
15 I'm going to hand over Exhibit 8 and going to  
16 page 158. I'm going to ask you to find the witness  
17 one, two, and three references that you think would  
18 help you.

19 A Okay.

20 Q All right. What page are you on?

21 A Hunt 286.

22 MR. KLEIN: She's referring to the Bates

1 number.

2 THE WITNESS: I started on 156.

3 BY MR. MACGILL:

4 Q Page 156. All right. Okay. So on  
5 page 156 of the Guidepost report, which is Exhibit  
6 8, you have made -- the Guidepost company makes  
7 reference to witness one, right?

8 A Correct.

9 Q And this witness one, there was a  
10 conversation with pastor in 2010. Right?

11 A That's what witness one shared.

12 Q So witness one repeated a conversation  
13 with Pastor REDACTED back in 2010; is that right?

14 A Yes. That's what witness one shared  
15 with us.

16 Q All right. Now, you said he had a  
17 conversation with pastor in 2010 and said it was  
18 like an atomic bomb. Do you see that?

19 A Yes.

20 Q And then you report various things. He  
21 said that pastor -- that Dr. Hunt had made  
22 advances is, et cetera. That's the report, right?

1 A Yes.

2 Q All right. Then we get to witness two.  
3 And this is talking about -- witness two said that  
4 the pastor that is REDACTED had told him about  
5 Dr. Hunt "using survivor." Do you see that?

6 A Yes.

7 Q All right. Then again, this is a 2012  
8 report where you are making reference here in the  
9 Guidepost or the Guidepost is making reference to  
10 a sexual abuse involving the survivor; is that  
11 right?

12 A Yes. That's what witness number two  
13 shared with us, the conversation that witness two  
14 had with Pastor REDACTED.

15 Q And Pastor REDACTED, as we can see by  
16 reading this part of the document, Pastor REDACTED,  
17 REDACTED had said that in 2012 the witness two  
18 that there had been sexual abuse involving  
19 survivor. Right?

20 A Yes.

21 Q I'd like to go back to witness one and  
22 look at what's referenced here in the description

1 with witness one in 2010 there's a reference  
2 pastor told him that it had happened at a beach  
3 condo and that Dr. Hunt kissed her, touched her  
4 breasts, undid her shorts, and it may have stopped  
5 there.

6 Do you see that?

7 A Yes.

8 Q And using your definition of sexual  
9 abuse that you provided to this court and jury  
10 earlier, you would characterize the report by  
11 Pastor REDACTED as reporting a sexual  
12 abuse in 2010 in witness one, right?

13 A That's what we understood from witness  
14 one.

15 Q Let's move to witness three. And  
16 witness three we see a reference on witness three  
17 on page 157. Do you see that?

18 A Yes.

19 Q And it is reported here that, again, it  
20 was REDACTED, once again, speaking to witness  
21 three, right?

22 A That is correct.

1 Q And REDACTED said, "Pastor told him  
2 about Dr. Hunt making advances on survivor and  
3 groping her and then subsequently covering it up."

4 Do you see that?

5 A Yes.

6 Q All right. And so again, it is Pastor  
7 REDACTED making a report to witness three that  
8 there had been, in your view as you define it, a  
9 sexual abuse report?

10 A Correct.

11 Q Right?

12 A Yes.

13 Q All right. So let's summarize. So in  
14 connection with your work, you relied on REDACTED  
15 REDACTED and his reports to you in writing and by  
16 his spoken word, right?

17 MR. KLEIN: Objection as to form. You can  
18 answer.

19 THE WITNESS: We interviewed Mr. REDACTED  
20 and took documents from Mr. REDACTED, and those were  
21 part of our consideration in the investigation.

22

1 BY MR. MACGILL:

2 Q And you relied on what REDACTED told  
3 you; is that fair?

4 A Yes.

5 Q All right. And you also relied on  
6 witnesses who reported -- witness one who reporter  
7 what REDACTED told him in 2010, right?

8 A Yes.

9 Q You relied on witness two, who reported  
10 what REDACTED told him about a sexual abuse in  
11 2012, right?

12 A Yes.

13 Q And third, you relied on witness three  
14 who had been told by REDACTED that there had  
15 been a sexual abuse as described by you in this  
16 report?

17 A Yes.

18 Q So REDACTED is -- is -- you rely on  
19 him by his direct communications to you, and then  
20 you rely on his communications that he made to  
21 witness one, two, and three. Right?

22 A Yes.

1           Q     All right. Now, the reality is that in  
2     2010     REDACTED     at the time that he may have had  
3     the conversation with witness one,     REDACTED  
4     didn't believe there had been a sexual abuse,  
5     right?

6           MR. KLEIN:   Objection as to form. You can  
7     answer.

8           THE WITNESS: I don't have any knowledge  
9     of exactly what     REDACTED     believed in 2010, that  
10    he didn't believe it was that.

11   BY MR. MACGILL:

12          Q     Do you have knowledge specifically --  
13    and I want you to be very precise in your  
14    testimony to the jury -- do you have evidence  
15    specifically, ma'am, based on your work in this  
16    case that in 2012     REDACTED     did not consider  
17    there to have been a sexual abuse of his wife?

18          MR. KLEIN:   Objection as to form. You can  
19    answer.

20          THE WITNESS: What was shared with us by  
21    the     REDACTED     is that they felt like what had happened  
22    was wrong, but they didn't have the words to



1 describe it.

2 BY MR. MACGILL:

3 Q Okay. But he did describe it in words  
4 as we just reviewed.

5 A The specific definition words to  
6 describe it as sexual abuse or sexual assault.

7 Q Right. But REDACTED didn't -- he  
8 himself described this, and you characterized what  
9 he described as sexual abuse, right?

10 A Yes.

11 Q But did you say in your report that  
12 REDACTED did not believe -- never used the  
13 word sexual abuse when he described the 2010  
14 incident to this pastor?

15 MR. KLEIN: Objection. The document  
16 speaks to itself. You can answer.

17 THE WITNESS: Restate your question,  
18 please.

19 BY MR. MACGILL:

20 Q REDACTED never told witness one  
21 there had been sexual abuse, did he?

22 A Witness one told us that -- what REDACTED

1 told him.

2 Q He never told witness one that there had  
3 been a sexual assault, did he?

4 MR. KLEIN: Objection as to form. Lack of  
5 personal knowledge. You can answer.

6 THE WITNESS: So witness one did not use  
7 the word sexual abuse.

8 BY MR. MACGILL:

9 Q And REDACTED never -- you had no  
10 information that REDACTED had told witness one  
11 there had been either a sexual abuse or a sexual  
12 assault, right?

13 A I do not. But the witness told us that  
14 it was not appropriate behavior, and that it  
15 happened in a condo and Mr. Hunt had kissed her,  
16 touched her breasts, undid her short and that it  
17 may have stopped there.

18 Q Let's focus on witness two. Witness two  
19 never reported that REDACTED had reported to  
20 him that there had been either a sexual abuse or  
21 sexual assault, right?

22 MR. KLEIN: Objection as to form. You can

1 answer.

2 THE WITNESS: I don't believe that witness  
3 two used the word sexual assault or sexual abuse,  
4 but said that he told him about Dr. Hunt abusing  
5 survivor and did not give specific details but  
6 shared it was sexual in nature.

7 BY MR. MACGILL:

8 Q And so to your knowledge, REDACTED  
9 never told witness two that there had been a  
10 sexual abuse or sexual assault in his conference  
11 with him -- or communication with him in 2012.

12 MR. KLEIN: Objection. Asked and  
13 answered. You can answer again.

14 THE WITNESS: He talked to witness two --  
15 or witness two shared with us that Mr. REDACTED shared  
16 with him about Dr. Hunt abusing survivor and also  
17 shared that it was sexual in nature.

18 BY MR. MACGILL:

19 Q Okay. So do you conclude that that was  
20 a report of sexual abuse by REDACTED ?

21 A What witness two reported to us was a  
22 report that REDACTED had reported to him

1 sexual abuse of Mrs. REDACTED.

2 Q Witness three. Did REDACTED report  
3 to witness three that there had been sexual abuse  
4 or sexual assault of his wife?

5 A Witness three did not use the words  
6 sexual abuse or sexual assault. He told us that  
7 REDACTED told him about Dr. Hunt making  
8 advances on survivor and groping her and then  
9 subsequently covering it up.

10 Q Were you told after the publication of  
11 this report by REDACTED that Guidepost report  
12 causes the readers to think that he had known it  
13 was a sexual assault at the time?

14 A I don't recall that statement.

15 (KILPATRICK Exhibit Number 30 was marked  
16 for identification.)

17 BY MR. MACGILL:

18 Q I'm going to hand you Exhibit 30. I'm  
19 going to ask you about REDACTED This is REDACT

20 REDACTED Did you receive -- looking at REDACTED

21 REDACTED did REDACTED

22 REDACTED

1 A Yes.

2 Q And then on REDACTED did REDACTED --

3 did he REDACTED

4 REDACTED

5 REDACTED

6 Do you see what I'm referring to.

7 A Yes.

8 Q I'm just referring to -- did you get

9 that REDACTED

10 A Yes, I did.

11 Q All right. I'm going to ask you,

12 Exhibit 31.

13 (KILPATRICK Exhibit Number 31 was marked  
14 for identification.)

15 BY MR. MACGILL:

16 Q Exhibit 31, is this the article that REDACT

17 REDACTED

18 A Let me go back. I'm not sure -- I  
19 received this article at some point. I'm not sure  
20 if it was originally sent to me or if it was a  
21 part of REDACTED you are  
22 referencing on REDACTED I'm not sure.

1 Q You're not sure. Okay. Focusing on REDACTED

2 REDACT --

3 MR. KLEIN: Before you ask, the document  
4 you just gave us, is this Exhibit 32?

5 MR. MACGILL: 31.

6 MR. KLEIN: 31. Hold on. This does not  
7 have a Bates number. Was this produced by someone  
8 or did you find this --

9 MR. MACGILL: Yeah. It was produced by  
10 you as a part of this document -- not produced by  
11 you, but it's referenced here.

12 MR. KLEIN: Okay.

13 BY MR. MACGILL:

14 Q All right. Now, sir, do you -- ma'am,  
15 do you see -- is this -- you can't tell us whether  
16 31, exhibit 31, is the REDACTED or is the article  
17 attached to this REDACTED?

18 A No.

19 MR. KLEIN: You can answer if you know.

20 THE WITNESS: I don't know. I don't know  
21 if that is. It may be. I don't know.

22

1 BY MR. MACGILL:

2 Q Now, is this -- do you recognize this  
3 article as to who the author -- where was this  
4 article published. Do you know?

5 A I don't. I mean I can read here that it  
6 says Protestia.com.

7 Q Do you know an entity called Protestia?

8 A It does not ring a bell.

9 Q Now, can you look at this article at 31,  
10 exhibit 31, is this the kind of article that you  
11 anticipated as one of the investigators here that  
12 you would have within a few days a headline  
13 entitled op-ed "Johnny Hunt assaulted a young  
14 pastor's wife. Her husband should be disqualified  
15 from the ministry." Do you anticipate that kind  
16 of press associated with the work that you had  
17 done, ma'am?

18 MR. KLEIN: Objection. Calls for  
19 speculation.

20 THE WITNESS: I don't know. I don't -- I  
21 don't know what I anticipated.  
22

1 BY MR. MACGILL:

2 Q It's just logical, isn't it, that  
3 somebody like you doing the kind of work that you  
4 did, making the statements that you made, that the  
5 logical extension of what you did was articles  
6 like this, Exhibit 31, right?

7 MR. KLEIN: Objection. Argumentative.  
8 You can answer.

9 THE WITNESS: I -- I don't know what I  
10 expected the articles would be. There would be  
11 articles on all sides of the issue.

12 BY MR. MACGILL:

13 Q How in the world, ma'am, could you not  
14 have expected a media firestorm in relation to the  
15 Guidepost report that you were a lead investigator  
16 on. Are you telling us you had no expectation of  
17 a press firestorm?

18 MR. KLEIN: Objection. Compound. You can  
19 answer.

20 THE WITNESS: I had an expectation that  
21 the report would generate media. I did not have an  
22 expectation for specifically this article or what



1 the articles would actually be like. I expected  
2 them to be all over the spectrum.

3 BY MR. MACGILL:

4 Q All over the media spectrum.

5 A Yes.

6 Q You expected that the results of your  
7 report would be on national news of different  
8 types, right?

9 A I mean I expected that -- yeah, I  
10 expected it would be out there.

11 Q Okay. It would be out there. You  
12 expected it would be, for example, on NBC Nightly  
13 News, didn't you?

14 A I don't know if I expected it to be on a  
15 news channel, but I expected it to be out there in  
16 the public space.

17 Q National news. You expected your report  
18 to be national news, right?

19 MR. KLEIN: Objection. Asked and  
20 answered. You can answer.

21 THE WITNESS: I expected it to be out in  
22 the national news.

1 BY MR. MACGILL:

2 Q And you know, we've seen some of your  
3 texts. We'll get more of them, I'm sure, if we --  
4 if the court so orders. But some of your texts  
5 you were starting to congratulate yourself and  
6 your co-investigator, lead investigator, even  
7 before the report, right?

8 MR. KLEIN: Objection as to form. You can  
9 answer.

10 THE WITNESS: I -- I don't recall. I'm  
11 happy to take a look at the texts and explain --

12 BY MR. MACGILL:

13 Q Now, wait a minute. Before the break we  
14 showed you one text. You don't think that was  
15 self-congratulatory, that text that I showed you  
16 before the break, where you and Mr. Holske are  
17 exchanging the information that you did?

18 A I would not describe it as  
19 self-congratulatory.

20 Q You wouldn't?

21 A No.

22 Q Okay. Well, but look at yourself here

1 and your role here. You and the people you work  
2 in concert with, you expected that you would have  
3 REDACTED from the moment this report was  
4 published, didn't you?

5 MR. KLEIN: Objection. Mischaracterizes  
6 her testimony and asked and answered. You can  
7 answer.

8 THE WITNESS: I think I said earlier in my  
9 testimony it depends on what you define REDACTED to  
10 mean.

11 BY MR. MACGILL:

12 Q National news, ma'am. NBC national  
13 news, ABC national news, Fox national news.  
14 That's what I'm indicating when I talk about the  
15 kind of REDACTED that you anticipated from what you  
16 called an "investigation"?

17 MR. KLEIN: Objection. Argumentative.  
18 You can answer.

19 THE WITNESS: We expected for this to be a  
20 very important report that would be out in the  
21 national media and that people were going to -- like  
22 people were interested in it. People were following

1     it the whole time. They were -- you know, they were  
2     -- we had an email for people to contact us if they  
3     wanted to participate in the investigation. There  
4     was news media all around it from the beginning.

5     BY MR. MACGILL:

6             Q     What evidence did you have that people  
7     would have any interest in a 12-year-old event  
8     between **REDACTED** and Pastor Johnny Hunt? What  
9     indication did you have that that would be of  
10    interest to anyone?

11            MR. KLEIN: Objection. Mischaracterizes  
12    her statement. You can answer.

13            THE WITNESS: I'm saying the engagement as  
14    a whole was of interest to people who were in the  
15    Southern Baptist Convention and people who followed  
16    the denomination. There has been, for several  
17    years, a reform on sexual abuse, and there were a  
18    lot of people that were interested in what the  
19    investigation would find.

20    BY MR. MACGILL:

21             Q     Right. And you found nothing, ma'am.  
22    You and your co-investigator, you found nothing

1 new of import to anybody or any person in the  
2 United States except a 12-year-old allegation by  
3 REDACTED and her husband, right?

4 MR. KLEIN: Objection. Argumentive. You  
5 can answer.

6 THE WITNESS: I would say we found a  
7 number of things. The only thing that fell under  
8 that first prong of abuse by an Executive Committee  
9 member was the situation involving Mr. Hunt.

10 MR. MACGILL: There was no Executive  
11 Committee member at the time of this incident. He  
12 wasn't an Executive Committee member, ma'am. You've  
13 already admitted that.

14 MR. KLEIN: Objection. Asked and  
15 answered. You can answer again.

16 BY MR. MACGILL:

17 Q You've admitted already he was not an  
18 Executive Committee member at the time of this  
19 incident, right?

20 MR. KLEIN: Objection. Asked and  
21 answered.

22

1 BY MR. MACGILL:

2 Q Right?

3 MR. KLEIN: You can answer.

4 THE WITNESS: At the time of the assault  
5 Mr. Hunt was not an Executive Committee member. But  
6 what I also told you was prior to that. While he  
7 was an Executive Committee member, there were  
8 instances in time where he showed special treatment  
9 and attention to REDACTED -- kisses on the hand,  
10 statements about, hey, hang back with me on the golf  
11 cart, and different things. And I would say in my  
12 experience that those indicate grooming.

13 BY MR. MACGILL:

14 Q Grooming. Now, that's a term. So is  
15 grooming a term of art, ma'am, in your business?

16 A Grooming is -- yeah, I would say it's a  
17 term of art that's part of different types of  
18 abuse.

19 Q Ma'am, on Exhibit 30, Mr. REDACTED on  
20 REDACTED this is REDACTED the publication of  
21 the report says: REDACTED

22 REDACTED

1 REDACTED

2 Do you see that?

3 A Yes.

4 Q And what is your understanding he meant  
5 by REDACT .

6 MR. KLEIN: Objection. Calls for  
7 speculation. Lack of firsthand knowledge and this  
8 is an attorney's eyes only document. I ask that we  
9 not refer to the specific quotes of this document,  
10 which you hadn't done earlier. And I'd ask if we do  
11 that, if you need to do that, then we very shortly  
12 remove Dr. Hunt, or you can ask general questions  
13 about refreshing her memory.

14 BY MR. MACGILL:

15 Q There's a reference to the word REDACT .  
16 What did you understand the word REDACT to mean in  
17 Exhibit 30?

18 A I could understand that to mean one of  
19 two things. So I don't know exactly what he meant  
20 by that.

21 Q What did you think at the time?

22 A It could have been -- he could have been

1 using it to abbreviate REDACTED or REDACTED  
2 REDACTED.

3 Q Now, based on this, based on Mr. REDACTED  
4 writing to you on this day, did you understand  
5 that Mr. REDACTED now had doubts about whether there  
6 was REDACTED or REDACTED involved in the  
7 information that he had reported to you?

8 A Can you ask that question again?

9 Q Did you understand based on this email  
10 that Mr. REDACTED himself had doubts as to whether  
11 or not there was REDACTED or REDACTED  
12 involved in this matter?

13 A No, I did not. I think earlier in my  
14 testimony I explained to you that at the time back  
15 in 2010, the REDACTED described to us what happened  
16 -- REDACTED explained in detail what happened to her  
17 and how Mr. Hunt had assaulted her and that they  
18 didn't know exactly what to call it. They felt  
19 like that it was wrong, but they didn't know what  
20 to call it because they were convinced by Mr. Hunt  
21 and Mr. Blankenship that because she didn't fight  
22 it off that it was consensual.



1           Q       But you -- you now know that your  
2       witness, the person you were relying on in your  
3       report was undermining the information that you  
4       reported to millions of people, ma'am, in terms of  
5       what had been said to witness one, witness two,  
6       and witness three, right?

7                   MR. KLEIN:   Objection.   Mischaracterizes  
8       the statement.

9                   THE WITNESS:   I don't have any knowledge  
10      of that.

11      BY MR. MACGILL:

12           Q       Ma'am, it's confirmed to you by your own  
13      -- by REDACTED   on           REDACTED           the  
14      report that there had had been REDACTED --

15                   MR. KLEIN:   Objection.   Please do not read  
16      from this document.

17      BY MR. MACGILL:

18           Q       I'm going to read two words -- only  
19      REDACTED       .   Do you see those two words?  
20      Do you see those two words?

21           A       Yes, I do.

22

1           Q     All right. Now, so the core witness --  
2     can I use the word core and not -- will you agree  
3     with the word that REDACTED was a core witness  
4     supporting your report? Is that fair?

5           A     Sure.

6           Q     Your core witness --

7                     MR. KLEIN: Objection. I'm sorry. I'll  
8     let you finish your sentence.

9     BY MR. MACGILL:

10          Q     Your core witness is indicating that  
11     with respect to witness one, two, and three there  
12     had been REDACTED , right?

13                    MR. KLEIN: Objection as to form. You can  
14     answer.

15                    THE WITNESS: That's what this REDACTED says.

16     BY MR. MACGILL:

17          Q     And the REDACTED also informed you -- I'm  
18     just going to quote part of it -- that your core  
19     witness confirms that witness one, two, three had  
20     only been given information in REDACTED  
21     right?

22          A     Correct.

1           Q       Now, at this point, ma'am, you had every  
2       reason to know that your core witness had  
3       undermined the core elements of your report that  
4       had been punished now to millions of people.  
5       Right?

6                   MR. KLEIN:  Objection.  Mischaracterizes  
7       her statement.  You can answer.

8                   THE WITNESS:  That's incorrect.

9       BY MR. MACGILL:

10           Q       What steps did you take for your part,  
11       ma'am, after you received this Exhibit 30 to see  
12       if you could stop the media fire form that had  
13       been created by your work?

14                   MR. KLEIN:  Objection.  You can answer.

15                   THE WITNESS:  I did not do anything as a  
16       result of this email.  I did not talk to anybody.

17       BY MR. MACGILL:

18           Q       All right.  Let's talk about the  
19       firestorm created by the SBC and the Executive  
20       Committee.  You understood that they were going to  
21       release the report as well as your own company,  
22       right?

1           MR. KLEIN:  Objection as to form.  
2   Compound.  You can answer.

3           THE WITNESS:  Yes.

4   BY MR. MACGILL:

5           Q     You understood that the Executive  
6   Committee authorized publication of your report?

7           MR. KLEIN:  Objection.  You can do it in  
8   your independent memory --

9           THE WITNESS:  Yeah.  I --

10          MR. KLEIN:  Let me finish the objection.  
11   Just for clarity you are speaking on behalf of your  
12   yourself, not on behalf of Guidepost.  In that  
13   capacity you can answer Rob's question.

14          THE WITNESS:  Please ask your question  
15   again.

16   BY MR. MACGILL:

17          Q     You understood the Executive Committee  
18   was going to publish the Guidepost report,  
19   correct?

20          A     I don't know -- I don't have any -- I  
21   don't have independent recollection of actually  
22   who was publishing the report as far as the SBC

1 was concerned.

2 Q Did you understand the SBC was going to  
3 on publish the report?

4 A I understood that some part within that  
5 was to publish the report.

6 Q All right. And did you understand there  
7 had been some board members associated with either  
8 entity that resigned for the reason that the  
9 report was going to be published?

10 A Do you have a time frame?

11 Q No. I -- let's first, did you  
12 understand there had been board resignations based  
13 on the idea that your report would be published?

14 A I know that there were board  
15 resignations but I'm not -- I don't know  
16 specifically the reasons behind. I don't have  
17 personal knowledge.

18 Q All right. Which board -- what boards  
19 members do you know in terms of resignations that  
20 occurred that were associated with the prospect of  
21 publishing the report of Guidepost?

22 MR. KLEIN: Objection. Mischaracterizes

1 her statement. You can answer.

2 BY MR. MACGILL:

3 Q What do you know about board  
4 resignations?

5 MR. KLEIN: You can answer.

6 THE WITNESS: I know that there were board  
7 members who resigned. Sitting here at this table, I  
8 don't know -- I don't recollect the names of board  
9 members who resigned. I think there's over 80,  
10 maybe close to hundred maybe total.

11 BY MR. MACGILL:

12 Q How many resigned?

13 A I don't recall.

14 Q When did you learn that there were going  
15 to be board resignations that were related to  
16 these events of your report?

17 MR. KLEIN: Objection. Mischaracterizes  
18 her statement.

19 BY MR. MACGILL:

20 Q That's fair. That's fair.

21 You understood there were board of  
22 directors resignations based on the Guidepost

1 report, right?

2 MR. KLEIN: You said board of directors  
3 now?

4 MR. MACGILL: Yeah.

5 MR. KLEIN: You can answer that question  
6 if you know.

7 THE WITNESS: I don't know about that. I  
8 know -- I know that earlier in the engagement there  
9 were resignations, but I'm not sure about what  
10 you're talking about right this minute.

11 BY MR. MACGILL:

12 Q You get Exhibit 30 and your core  
13 witness, Mr. REDACTED is --

14 MR. KLEIN: I ask you not -- it looks like  
15 you're about to read from it, Rob. I'm going to ask  
16 again that you don't read from it. You've read a  
17 portion that I allowed as a professional courtesy.  
18 I ask you not to read from it any further. You  
19 certainly can, I would just ask that before you do  
20 that Dr. Hunt move into a separate Zoom room.

21 BY MR. MACGILL:

22 Q Your core witness has provided the

1 information that we see in this Exhibit 30. All  
2 right? Agreed?

3 A Yes.

4 Q Now, we're displaying this for the court  
5 and jury here so they can read along with us.  
6 With respect to this REDACTED did you at this time,  
7 based on the information in this email, suggest to  
8 anybody at Guidepost or for your own part, provide  
9 notice immediately to the Executive Committee of  
10 the content of this REDACTED

11 A No, I did not.

12 Q And that's true with respect to the SBC.  
13 You didn't take any steps to immediately advise  
14 them of this information in Exhibit 30; is that  
15 right?

16 A No, I did not.

17 Q When did you, ma'am, or your company to  
18 your knowledge, submit this REDACTED to the SBC  
19 and/or the Executive Committee?

20 MR. KLEIN: Objection as to form you can  
21 answer.

22 THE WITNESS: I did not submit this REDACTED



1 to anyone. I don't have any knowledge of whether  
2 someone else submitted it or not.

3 BY MR. MACGILL:

4 Q Now, Mr. Holske responded to this REDACTED  
5 from REDACTED to you and the CEO of the  
6 company, did he not?

7 A Yes. It appears that he did.

8 Q And do you why Mr. Holske responded to  
9 the CEO of your company?

10 A I don't. You would need to ask him.

11 Q Now, Mr. Holske indicated -- I don't --  
12 to the CEO of the company and with a copy to you  
13 in the manner that we can see on the court's  
14 screen, right?

15 MR. KLEIN: Objection to what's being seen  
16 action on the court's screen, but you can answer.

17 THE WITNESS: What's the question?

18 MR. MACGILL: That's your problem. That's  
19 your fault. That's what you've caused here.

20 MR. KLEIN: No, I'm just saying we're not  
21 in the courtroom. I have no idea --

22

1 MR. MACGILL: I'm read it.

2 MR. KLEIN: That's all.

3 MR. MACGILL: I'll read it.

4 MR. KLEIN: Rob, you are missing my point.

5 I wasn't --

6 MR. MACGILL: Enough.

7 MR. KLEIN: I was just saying you're  
8 talking about a courtroom. We don't know what's  
9 going to be on the court screen. I just want to  
10 make it easier for the witness so she knows what  
11 you're saying. That's all.

12 BY MR. MACGILL:

13 Q Ma'am, I'm going to -- the jury is going  
14 to see the following words on the court's screen.

15 MR. KLEIN: Rob, please. I object. I  
16 wasn't trying to be tricky or anything. I just  
17 wanted to point out you were saying what's being  
18 shown on a screen in the courtroom. I just wanted  
19 to say we're not in a courtroom now. That's all.

20 BY MR. MACGILL:

21 Q Ma'am, I want you to know that we can't  
22 compel you to come testify to defend what you did

1 here in the courtroom in this case. Do you  
2 understand that? We do not have the power to  
3 compel your testimony in the court. Do you  
4 understand that?

5 A Yes.

6 Q So do you understand that we'll be  
7 utilizing your testimony to display the video of  
8 your testimony to this court and this jury? Do  
9 you understand that?

10 A I understand that could be a  
11 possibility, yes.

12 Q Do you understand also that in order for  
13 the jury to see what you did or failed to do, as  
14 we say, that we're going to be displaying actual  
15 court documents -- actual exhibits to the jury so  
16 they can read along in the exhibits, so they can  
17 see what we're asking you about simultaneously?

18 MR. KLEIN: Objection. Argumentative.  
19 You can answer.

20 THE WITNESS: Yes.

21 BY MR. MACGILL:

22 Q Now, your counsel is not allowing us to

1 communicate Mr. Holske's information, but let me  
2 just tell you this. We're going to put it up so  
3 the jury can see it and the judge of this Court  
4 can see it. Now, looking at this statement, would  
5 you agree that the REDACTED that REDACTED sent to  
6 you was a viewpoint.

7 MR. KLEIN: Objection. Lack of personal  
8 knowledge. You can answer.

9 THE WITNESS: I think my understanding of  
10 this REDACTED is that the news article is being  
11 referred to as a viewpoint, but I have personal  
12 knowledge of what Russ Holske was talking about.  
13 But that would have been my interpretation.

14 BY MR. MACGILL:

15 Q The jury can what Exhibit 30 means and  
16 particularly the REDACTED But it's  
17 fair to say, ma'am, that you understand for your  
18 part when you received this REDACTED that Mr. REDACTED  
19 REDACTED was not communicating some type of  
20 viewpoint. He was communicating facts to you,  
21 wasn't he?

22 MR. KLEIN: Objection as to form. Lack of

1 knowledge. You can answer.

2 THE WITNESS: I think Mr. REDACTED was  
3 communicating his thoughts and feelings and facts  
4 about the articles that he was seeing and about the  
5 report.

6 BY MR. MACGILL:

7 Q He was disclosing facts about what he  
8 said to witness one, two, and three, wasn't he?

9 MR. KLEIN: Objection. Asked and  
10 answered. You can answer.

11 THE WITNESS: Yes.

12 MR. MACGILL: Go to the next exhibit,  
13 ma'am.

14 (KILPATRICK Exhibit Number 32 was marked  
15 for identification.)

16 BY MR. MACGILL:

17 Q I'll hand you Exhibit 32? Now, is this  
18 REDACTED involving you -- well, let me ask  
19 you. Who is this -- strike that.

20 Is this REDACTED involving you and  
21 certain people at Guidepost?

22 A It appears to be REDACTED between

1 Julie Myers Wood, Krista Tongring, and myself.

2 Q Did you initiate this?

3 A I'm not sure. I'm not sure. I don't  
4 know the answer on that.

5 Q Now, sir -- I'm sorry -- ma'am, on

6 REDACTED

7 says in part: REDACTED

8 REDACTED

9 Do you see that?

10 A Yes.

11 Q Do you know who is writing that?

12 A I don't.

13 Q Do you know why?

14 A Why? I don't know.

15 Q Do you know why REDACTED is sending  
16 a text to your co-lead investigator on May 24,  
17 2022, pertaining to Johnny Hunt?

18 MR. KLEIN: Objection. Calls for  
19 speculation.

20 BY MR. MACGILL:

21 Q Did he say why he was doing this?

22 A I don't recall. I don't recall.

1 Q Okay. And then this -- is this -- let  
2 me use a common phrase, if you don't mind, is this  
3 a victory lap for the three of you -- the CEO of  
4 your company, Ms. Tongring, and yourself -- where  
5 you are congratulating yourself on what you've  
6 done in relation to your report?

7 A I wouldn't call it a victory lap. I  
8 think it was just information of what was going on  
9 in real time.

10 Q Well, the CEO says REDACTED  
11 right?

12 A Yes.

13 Q Did you speak to the CEO of your company  
14 about that?

15 MR. KLEIN: Objection.

16 THE WITNESS: I don't recall us having --  
17 I don't recall us having a conversation about that,  
18 but I knew that REDACTED

19 BY MR. MACGILL:

20 Q All right. Did do speak -- did you  
21 speak at any time to the CEO of your company about  
22 the results of your investigation in terms of the

1 press.

2 THE WITNESS: I do not think -- I don't  
3 recall any conversations with Ms. Wood about the  
4 results out in the press. I mean I had multiple  
5 conversations with Ms. Wood over the course of  
6 working for her, and I don't specifically recall us  
7 talking about the press.

8 BY MR. MACGILL:

9 Q All right, now, ma'am, you know, God  
10 willing and this court providing, we're hoping to  
11 get the text strings of you and all the people  
12 involved here. And so perhaps we'll know more  
13 once we get the text information and we get your  
14 phone and everybody else's phone imaged properly.  
15 But we don't have that right now. All we have is  
16 your recollection. Okay?

17 A Uh-huh.

18 Q Do you recall, ma'am, separate and apart  
19 from seeing what your phone has to say and those  
20 on the phones of everybody else in your company,  
21 can you tell us whether you recall having any text  
22 exchanges where you were congratulating one



1 another on the press results of the work by  
2 Guidepost?

3 A I do not recall text exchanges  
4 congratulating each other on the media.

5 Q Next question. Do you recall any text  
6 exchanges where you communicated with the CEO of  
7 your company and others about any press coverage  
8 associated with this report?

9 MR. KLEIN: Objection. Asked and  
10 answered. You can answer again.

11 THE WITNESS: I don't recall.

12 BY MR. MACGILL:

13 Q Now, in terms of looking at Exhibit 32,

14 REDACTED

15 REDACTED

16 REDACTED

17 Do you see that?

18 A Yes.

19 Q Okay. Now, was that -- was having  
20 something that was REDACTED was that something  
21 that you intended, ma'am, based on your work as  
22 colead investigator here?

1           A       I didn't intend anything except to  
2 perform an independent investigation and follow  
3 the facts where they led.

4           Q       Now, based on this investigation, was  
5 there follow-on work in the religious community  
6 for Guidepost?

7           A       I'm sorry. Repeat that.

8           Q       Based on this -- well, strike that.  
9 After this report was published, was there  
10 follow-on business that you received that  
11 Guidepost associated with religious organizations?

12          A       I was an independent contractor at that  
13 time and continued to work with Guidepost. I  
14 wasn't always privy to what was coming in the door  
15 as a result of that until I became a full-time  
16 employee.

17          Q       Once you became a full-time employee,  
18 was there additional business that came in the  
19 religious sector associated with investigations as  
20 you described at the outset of this testimony  
21 today?

22          A       I don't know the answer to that. I do

1 know that Guidepost has always worked in this  
2 sector, so I don't know if it's additional  
3 business or it's just the normal course of what  
4 comes over the course of the year. I don't have  
5 an answer for that.

6 Q So have you done any metrics on that at  
7 all in your work to find out whether as a matter  
8 of looking at this longitudinally. That is, over  
9 time, that the business has increased in this  
10 sector?

11 A I have not.

12 Q Okay. Now, I'm guessing, sir, that --  
13 we've seen some news accounts regarding the  
14 building of a database by your company after this  
15 report was published. Do you remember that?

16 A Yes.

17 Q What is the entity ARITF? What does  
18 that stand for, that acronym?

19 A The abuse reform implementation task  
20 force.

21 Q Is that an independent organization of  
22 some entity?

1           A       I believe it's a task force, and I'm  
2       not -- I'm not sure exactly where it sits. But  
3       it's related to the Southern Baptist Convention.

4           Q       Okay. And after this initial report,  
5       did the ARITF recommend Guidepost for further work  
6       after the report?

7                   MR. KLEIN: Objection. You can answer.

8                   THE WITNESS: Yes, they did.

9       BY MR. MACGILL:

10          Q       Now, after this -- let's talk about you  
11       now, if you don't mind, ma'am, for a few minutes.  
12       I want to talk about how you were impacted or  
13       affected by this report. Once this report was  
14       published, it's a fact, isn't it, that you became  
15       a leader of a new division at your company, right?

16                  MR. KLEIN: Objection as to form. At what  
17       point, Rob?

18       BY MR. MACGILL:

19          Q       After this report was published.

20          A       In November of 2022.

21          Q       Yes. You did.

22          A       The report was published in May of 2022.

1           Q     Right. And that's why -- I just want to  
2     make sure the jury understands. So within how  
3     many months, within six months of the publication  
4     of this report -- within six months, there's a new  
5     division created at Guidepost; is that right?

6           A     The division had always been there, but  
7     they asked me to lead it.

8           Q     Well, I'm reading what Mr. Blalock said.  
9     Mr. Blalock said that Guidepost has established a  
10    faith-based division of their firm called  
11    faith-based solutions. Is that right?

12           MR. KLEIN: Objection as to form. Lack of  
13    personal knowledge. You can answer.

14           THE WITNESS: Yeah. I'm not sure -- those  
15    things were done before I came on in November of  
16    2022. Guidepost has always been involved in faith  
17    work and has always had a core group of people that  
18    do that. And we have started to call ourself the  
19    faith-based solutions kind of group. That's what we  
20    call ourselves.

21    BY MR. MACGILL:

22           Q     But did you tell Mr. Blalock that you --

1 did you tell the Executive Committee of the SBC  
2 that you led a new division?

3 A I may have said that to Mr. Blalock.  
4 Mr. Blalock interviewed me at some point.

5 Q But in any event, you became head of  
6 this division within six months of the publication  
7 of this report?

8 A That's correct.

9 Q Now, the Guidepost report included  
10 information about convicted child molesters; is  
11 that right?

12 A I believe so, yes.

13 Q It talked about -- it also contained  
14 information about convicted sexual abusers; is  
15 that right?

16 A You are talking about.

17 Q The report itself.

18 A Exhibit 8?

19 Q Yeah.

20 A Yes.

21 Q Now, with respect to the Houston  
22 Chronicle article as one example, there wasn't

1 reference to convicted child molesters in the  
2 report, but instead the Houston Chronicle focused  
3 exclusive on -- exclusively on Pastor Johnny Hunt,  
4 did it not?

5 MR. KLEIN: Objection as to form. You can  
6 answer.

7 THE WITNESS: I haven't read those  
8 articles in a while. I'm not sure what all they  
9 did, but I know that they did write an article, as  
10 you've given me these text messages, about the  
11 matter involving Mr. Hunt.

12 BY MR. MACGILL:

13 Q Now, your company Guidepost Solutions,  
14 does it have a code of commitment?

15 MR. KLEIN: Objection as to form. You can  
16 answer.

17 THE WITNESS: I'm not sure.

18 BY MR. MACGILL:

19 Q You have not seen what your company  
20 designates as its code of commitment?

21 A If you are talking about a code of  
22 commitment or code of conduct, I think they do

1 have that, yes.

2 Q And there's a code of commitment at  
3 Guidepost that you are familiar with, right?

4 A I believe so.

5 Q And integrity is at the heart of  
6 everything we do. That's what you say. That's  
7 what Guidepost says; is that right?

8 A That's correct.

9 Q Okay. And with respect to that code of  
10 commitment, did you endeavor to follow that in  
11 terms of your work on the Guidepost work for --  
12 associated with this investigation that's the  
13 subject of this lawsuit?

14 A Yes.

15 Q Did you understand that the code of  
16 commitment obligates you to act ethically and  
17 honestly and with integrity in your work?

18 A Yes.

19 Q Now, you wrote in the report -- or  
20 strike that.

21 Guidepost wrote in its final report that  
22 "state licensing records from the time indicate that



1 Mr. Blankenship was not a licensed counselor."

2 Do you remember that.

3 A Yes.

4 Q Now, in fact, it's a reality that  
5 Mr. Blankenship did not need a professional  
6 counseling license in 2010, did he?

7 A I'm not aware of whether he needed  
8 REDACTED or not. That's a legal conclusion.

9 Q Why would you say in the report that he  
10 was not a licensed counselor without looking to  
11 whether it was required that he would be a  
12 licensed counselor?

13 A Because that's the information that we  
14 had, that he was not a licensed counselor.

15 Q But the fact of the matter is he was  
16 providing counseling under an exception to the  
17 counseling license agreement -- licensing  
18 requirements, wasn't he?

19 MR. KLEIN: Objection as to form. You can  
20 answer.

21 THE WITNESS: I'm not sure about exactly  
22 how he was practicing at that time.

1 BY MR. MACGILL:

2 Q Ma'am, you said he was not a licensed  
3 counselor in the report, the Guidepost --

4 A He did not hold a state license. That's  
5 all that we said in the report. That's what we  
6 said.

7 Q Right. But if you were going to be fair  
8 about it, ma'am, you would have confirmed by your  
9 own writing at Guidepost that he was authorized  
10 specifically by Georgia law to do what he did as a  
11 counselor, right?

12 MR. KLEIN: Objection. Calls for a legal  
13 conclusion. You can answer.

14 THE WITNESS: We did not -- we did not  
15 include Georgia law in the report describing an  
16 exception.

17 BY MR. MACGILL:

18 Q You did no investigation as to whether  
19 he was exempted from any licensing requirement,  
20 that is Mr. Blankenship, as a part of your report,  
21 right?

22 MR. KLEIN: Objection as to what she did

1 versus what Guidepost did. You can ask her  
2 certainly what she did.

3 BY MR. MACGILL:

4 Q Let's make sure -- you took no steps.  
5 You did nothing yourself to determine whether  
6 licensing was required for Mr. blankenship; is  
7 that right?

8 A I did not, but I will also tell you that  
9 the REDACTED were under the impression or told us  
10 that they were impression that he was a licensed  
11 counselor.

12 Q Now, let's continue based on the  
13 counsel's objection, not only did you fail to take  
14 any investigatory steps to determine whether  
15 licensing was required for Mr. Blankenship, your  
16 colead investigator didn't do so either to your  
17 knowledge, did he?

18 MR. KLEIN: Objection. You can answer.

19 THE WITNESS: I'm not sure what, if  
20 anything, Mr. Holske did as well.

21 BY MR. MACGILL:

22 Q And as a matter of fact, to your

1 knowledge, Guidepost the company, the entire  
2 company, did nothing -- to repeat -- nothing to  
3 determine whether or not Mr. Blankenship required  
4 a licensure to be a counselor under Georgia law?

5 A I do not know of anything -- I do not  
6 know of anything that Guidepost did -- anybody in  
7 the company did in that regard.

8 Q But nevertheless, what Guidepost said to  
9 the public published to millions of people, "State  
10 licensing records from the time indicate that  
11 Mr. Blankenship was not a licensed counselor.  
12 That's what the report says, right?

13 MR. KLEIN: Objection. Mischaracterizes  
14 the statement, but you can answer.

15 THE WITNESS: The report does say that he  
16 was not a licensed counselor.

17 BY MR. MACGILL:

18 Q One more exhibit and then I think we're  
19 finished.

20 (KILPATRICK Exhibit Number 33 was marked  
21 for identification.)  
22

1 BY MR. MACGILL:

2 Q Ma'am, I'm going to hand you Exhibit 33.  
3 And my question first is if you look at REDACTED  
4 REDACTED on Exhibit 33, this REDACTED  
5 REDACTED

6 A At the very bottom it looks like it's REDACT  
7 REDACTED  
8 REDACTED

9 Q My mistake. Now, what role did Sunny  
10 Lee have?

11 A Sunny Lee works in our -- she works on  
12 faith-based matters and worked on this engagement  
13 as well.

14 Q So, ma'am, I want to look at the REDACTED  
15 REDACTED Do you  
16 see that?

17 A REDACTED

18 Q REDACTED

19 A Yes.

20 Q Mr. Holske says to you: REDACTED  
21 REDACTED  
22 REDACTED

1 Do you see that?

2 A Yes.

3 Q REDACTED

4 A Yes.

5 Q Then you responded on REDACTED

6 REDACTED

7 REDACTED

8 REDACTED

9 REDACTED

10 Is that your REDACTED

11 A Yes.

12 Q And by REDACTED

13 REDACTED

14 A The REDACTED .

15 Q Now, I want to go back to the REDACTED

16 REDACTED that you

17 identified earlier. In this REDACTED she says in

18 the last sentence at the bottom of the first

19 paragraph. REDACTED

20 REDACTED

21 REDACTED

22 REDACTED Do you see that?

1           A       I do see it.

2           Q       Now, focusing on her words, REDACTED  
3                   REDACTED                   do you agree  
4       with her characterization that the Guidepost  
5       report had as its                   REDACTED

6           REDACTED

7                   MR. KLEIN:   Objection as to form.   Lack of  
8       personal knowledge.   You can answer.

9                   THE WITNESS:   I don't know what Ms. Lee  
10      meant by this, but the way that I read it is that

11                   REDACTED

12                   REDACTED

13                   REDACTED

14                   MR. MACGILL:   Take a short break.   I think  
15      we're virtually finished.

16                   VIDEOGRAPHER:   We're off the record at  
17      4:10 p.m.

18                   (Whereupon, a brief recess was taken.)

19                   VIDEOGRAPHER:   We're now back on the  
20      record at 4:17 p.m.   You may proceed.

21      BY MR. MACGILL:

22           Q       Ma'am, just a few more questions.

1           A       With respect to the event involving  
2       REDACTED     and Pastor Johnny Hunt that is the  
3       subject of the Guidepost report, if you as an  
4       investigator, ma'am, had concluded that the  
5       interactions between them were consensual, would  
6       you have left Johnny Hunt out of the report.

7           MR. KLEIN:   Objection.   Calls for  
8       speculation, but you can answer.

9           THE WITNESS:   Yes.

10       BY MR. MACGILL:

11           Q       One final question, ma'am.   If you had,  
12       based on your investigation, determined that the  
13       events between   REDACTED     and Pastor Johnny Hunt  
14       in 2010 were likely consensual, would you have  
15       left the reference to this event out of the  
16       Guidepost report?

17           MR. KLEIN:   Objection.   Calls for  
18       speculation.   You can answer.

19           THE WITNESS:   Do you have a definition for  
20       likely?

21       BY MR. MACGILL:

22           Q       Yes, I do.   More likely than not.



1 MR. KLEIN: Same objection, but you can  
2 answer.

3 THE WITNESS: So you are saying if it was  
4 more likely than not that it was consensual.

5 BY MR. MACGILL:

6 Q Right.

7 A Yes.

8 Q Then you would have let it out of the  
9 report?

10 A Yes.

11 MR. MACGILL: Okay. That's all we have,  
12 sir.

13 MR. KLEIN: I believe Brandon has a couple  
14 of questions.

15 EXAMINATION BY COUNSEL FOR THE EC

16 BY MR. BUNDREN:

17 Q Ms. Kilpatrick, my name is Brandon  
18 Bundren. You understand that I represent the  
19 Executive Committee in this lawsuit?

20 A Yes.

21 Q And earlier today plaintiff's counsel  
22 asked you about the meeting between yourself and

1 Mr. Holske and Dr. Hunt that occurred on May 12,  
2 2022, correct?

3 A Yes.

4 Q And that was the second meeting that you  
5 had with Dr. Hunt?

6 A That's correct.

7 Q And in that meeting that was when you  
8 and Mr. Holske discussed the specifics of the  
9 incident that took place between Dr. Hunt and  
10 Ms. REDACTED on July 25th, 2010; is that right?  
11 That's correct.

12 A That's correct.

13 Q And that's when you confronted Dr. Hunt  
14 about those allegations that Ms. REDACTED made; is  
15 that right?

16 A Yes.

17 Q Did Dr. Hunt during that interview ever  
18 tell you on May 12, 2022, that he had kissed  
19 Ms. REDACTED?

20 A No.

21 Q During that interview did Dr. Hunt ever  
22 tell you that he awkwardly fondled Ms. REDACTED?

1           A       No, he did not.

2           Q       In fact, I believe whats in your report  
3       is he told you there was no contact whatsoever  
4       between himself and Ms. REDACTED; is that right?

5           A       That's what he told us.

6           Q       Did Dr. Hunt ever tell you during that  
7       interview that it was Mrs. REDACTED who initiated  
8       the encounter between him and Dr. Hunt?

9           A       No, he did not.

10          Q       Are you aware that less than a year  
11       after your conversation with Dr. Hunt that he told  
12       the world that he kissed Mrs. REDACTED, awkwardly  
13       fondled her and that Ms. REDACTED initiated the  
14       contact between he and Mrs. REDACTED?

15          A       Yes. I am aware of that.

16          Q       But Hunt -- Dr. Hunt never told you that  
17       during your conversations with you, did he?

18          A       No, he did not.

19                   MR. BUNDREN: Pass the witness.

20                   MR. KLEIN: I have no questions. Thank  
21       you.

22

1 BY MR. MACGILL:

2 Q So ma'am, let's be more specific. Let's  
3 now -- Mr. Bundren has had a chance to ask you  
4 some questions about May 12, 2022. I'd like you  
5 to tell this court and jury exactly what you asked  
6 Pastor Johnny Hunt on May 12, 2022. Your  
7 questions of him when you quote "confronted him."  
8 Tell the court and jury exactly what you asked  
9 him?

10 MR. KLEIN: Objection. Asked and  
11 answered, but you can answer again.

12 THE WITNESS: Mr. Holske led that  
13 interview and so I asked follow-up questions as  
14 necessary but I did not ask the specific questions  
15 of him.

16 BY MR. MACGILL:

17 Q What specifically, ma'am, did Mr. Holske  
18 ask Pastor Johnny Hunt?

19 A I believe that he asked him --

20 Q You believe or know?

21 A I do not have an independent  
22 recollection apart of notes as to the specific

1 questions that Mr. Holske asked.

2 Q One minute. So you, ma'am, have no  
3 independent recollection of the specific questions  
4 that Mr. Holske asked Pastor Johnny Hunt on  
5 May 12, 2022?

6 A That's correct.

7 Q Did you take contemporaneous notes of  
8 that?

9 A Yes, I did.

10 Q Did Mr. Holske?

11 MR. KLEIN: Objection as to form. You can  
12 answer.

13 THE WITNESS: That interview, as we said  
14 earlier, was conducted virtually, and Mr. Holske was  
15 in a different location than I was. And so I'm not  
16 sure if he took them. I didn't see -- I wasn't able  
17 to see what he was taking. I think that afterwards  
18 we compared our reports.

19 MR. MACGILL: Give us one minute, if you  
20 would.

21 VIDEOGRAPHER: Off the record at 4:26 p.m.  
22 (Whereupon, a brief recess was taken.)

1 VIDEOGRAPHER: We are now back on they  
2 record at 4:40 p.m. You may proceed.

3 MR. MACGILL: We have no further  
4 questions. Thank you. Thank you, everyone.

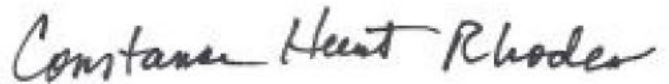
5 VIDEOGRAPHER: This now end the deposition  
6 Samantha Kilpatrick. We are off the record at 4:40  
7 p.m.

8 (Whereupon, at 4:40 p.m., the deposition  
9 of SAMANTHA KILPATRICK was concluded.)

10 \* \* \* \* \*

CERTIFICATE OF NOTARY PUBLIC

I, CONSTANCE HUNT RHODES, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in stenotypy and thereafter reduced to typewriting under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and further, that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.



CONSTANCE HUNT RHODES  
Notary Public in and for  
the District of Columbia

My commission expires:

January 31, 2028

Veritext Legal Solutions

1100 Superior Ave

Suite 1820

Cleveland, Ohio 44114

Phone: 216-523-1313

February 22, 2024

To: Mr. Klein

Case Name: Hunt, Johnny M. v. Southern Baptist Convention; Et Al.

Veritext Reference Number: 6438470

Witness: Samantha Kilpatrick                      Deposition Date: 2/2/2024

Dear Sir:

Enclosed please find a deposition transcript. Please have the witness review the transcript and note any changes or corrections on the included errata sheet, indicating the page, line number, change, and the reason for the change. Have the witness' signature notarized and forward the completed page(s) back to us at the Production address shown

above, or email to [production-midwest@veritext.com](mailto:production-midwest@veritext.com).

If the errata is not returned within thirty days of your receipt of this letter, the reading and signing will be deemed waived.

Sincerely,

Production Department

NO NOTARY REQUIRED IN CA

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DEPOSITION REVIEW  
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6438470

CASE NAME: Hunt, Johnny M. v. Southern Baptist Convention;  
Et Al.

DATE OF DEPOSITION: 2/2/2024

WITNESS' NAME: Samantha Kilpatrick

In accordance with the Rules of Civil  
Procedure, I have read the entire transcript of  
my testimony or it has been read to me.

I have made no changes to the testimony  
as transcribed by the court reporter.

\_\_\_\_\_  
Date Samantha Kilpatrick

Sworn to and subscribed before me, a  
Notary Public in and for the State and County,  
the referenced witness did personally appear  
and acknowledge that:

They have read the transcript;

They signed the foregoing Sworn  
Statement; and

Their execution of this Statement is of  
their free act and deed.

I have affixed my name and official seal

this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Notary Public

\_\_\_\_\_  
Commission Expiration Date

DEPOSITION REVIEW  
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6438470

CASE NAME: Hunt, Johnny M. v. Southern Baptist Convention;  
Et Al.

DATE OF DEPOSITION: 2/2/2024

WITNESS' NAME: Samantha Kilpatrick

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Procedure, I have read the entire transcript of  
my testimony or it has been read to me.

I have listed my changes on the attached  
Errata Sheet, listing page and line numbers as  
well as the reason(s) for the change(s).

I request that these changes be entered  
as part of the record of my testimony.

I have executed the Errata Sheet, as well  
as this Certificate, and request and authorize  
that both be appended to the transcript of my  
testimony and be incorporated therein.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Samantha Kilpatrick

Sworn to and subscribed before me, a  
Notary Public in and for the State and County,  
the referenced witness did personally appear  
and acknowledge that:

They have read the transcript;

They have listed all of their corrections  
in the appended Errata Sheet;

They signed the foregoing Sworn  
Statement; and

Their execution of this Statement is of  
their free act and deed.

I have affixed my name and official seal  
this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Notary Public

\_\_\_\_\_  
Commission Expiration Date

ASSIGNMENT NO: 6438470

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Date \_\_\_\_\_ Samantha Kilpatrick  
SUBSCRIBED AND SWORN TO BEFORE ME THIS \_\_\_\_\_  
DAY OF \_\_\_\_\_, 20\_\_\_\_.

Notary Public

Commission Expiration Date

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.



VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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